

Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. Nitrogen Oxides (NOx) Budget Trading Program
 - OAC Chapter 3745-14
Nitrogen Oxides (NOx) Budget Trading Program
 - OAC Chapter 3745-14
 - a. Office of Regulatory Information System Facility Code - 6031
 - a. Office of Regulatory Information System Facility Code - 6031
 - b. The following regulated electrical generating unit is subject to the applicable requirements specified in OAC Chapter 3745-14 and the annual NOx allowance allocations listed below:
 - . Annual Allowance for Calendar Years
2004 through 2007
Emissions Unit
 - B001 - Boiler #1 111
 - B002 - Boiler #2 29
 - B004 - Boiler #3 140
 - b. The following regulated electrical generating unit is subject to the applicable requirements specified in OAC Chapter 3745-14 and the annual NOx allowance allocations listed below:
 - . Annual Allowance for Calendar Years
2004 through 2007
Emissions Unit
 - B001 - Boiler #1 111
 - B002 - Boiler #2 29
 - B004 - Boiler #3 140
 - c. The emissions unit identified in Section A.2.b above is a NOx budget unit under OAC rule 3745-14-01(C)(1).
[OAC rule 3745-14-01(C)(1)(a)(i)]
 - c. The emissions unit identified in Section A.2.b above is a NOx budget unit under OAC rule 3745-14-01(C)(1).
[OAC rule 3745-14-01(C)(1)(a)(i)]
 - d. The NOx authorized account representative shall submit a complete NOx budget permit application in accordance with the deadlines specified in paragraphs (B)(2) and (B)(3) of OAC rule 3745-14-03. The NOx authorized account representative shall also submit, in a timely manner, any supplemental information that the Director determines is necessary in order to review a NOx budget permit application and issue or deny a NOx budget permit.
[OAC rules 3745-14-01(E)(1)(a)(i), 3745-14-01(E)(1)(a)(ii), and 3745-14-03(B)(1)]
 - d. The NOx authorized account representative shall submit a complete NOx budget permit application in accordance with the deadlines specified in paragraphs (B)(2) and (B)(3) of OAC rule 3745-14-03. The NOx authorized account representative shall also submit, in a timely manner, any supplemental information that the Director determines is necessary in order to review a NOx budget permit application and issue or deny a NOx budget permit.
[OAC rules 3745-14-01(E)(1)(a)(i), 3745-14-01(E)(1)(a)(ii), and 3745-14-03(B)(1)]

- e. Beginning May 31, 2004, the owners and operators of each NOx budget source and each NOx budget unit at the source shall hold NOx allowances available for compliance deductions under paragraph (E) of OAC rule 3745-14-06, as of the NOx allowance transfer deadline, in the unit's compliance account and the source's overdraft account in an amount not less than the total NOx emissions for the control period from the unit, as determined in accordance with OAC rule 3745-14-08, plus any amount necessary to account for actual utilization under paragraph (C)(5) of OAC rule 3745-14-05 for the control period.
[OAC rules 3745-14-01(E)(3)(a) and 3745-14-01(E)(3)(c)]
- e. Beginning May 31, 2004, the owners and operators of each NOx budget source and each NOx budget unit at the source shall hold NOx allowances available for compliance deductions under paragraph (E) of OAC rule 3745-14-06, as of the NOx allowance transfer deadline, in the unit's compliance account and the source's overdraft account in an amount not less than the total NOx emissions for the control period from the unit, as determined in accordance with OAC rule 3745-14-08, plus any amount necessary to account for actual utilization under paragraph (C)(5) of OAC rule 3745-14-05 for the control period.
[OAC rules 3745-14-01(E)(3)(a) and 3745-14-01(E)(3)(c)]
- f. NOx allowances shall be held in, deducted from, or transferred among NOx allowance tracking system accounts in accordance with OAC rules 3745-14-05, 3745-14-06, 3745-14-07, and 3745-14-09.
[OAC rule 3745-14-01(E)(3)(d)]
- f. NOx allowances shall be held in, deducted from, or transferred among NOx allowance tracking system accounts in accordance with OAC rules 3745-14-05, 3745-14-06, 3745-14-07, and 3745-14-09.
[OAC rule 3745-14-01(E)(3)(d)]
- g. A NOx allowance shall not be deducted, in order to comply with the requirement under paragraph (E)(3)(a) of OAC rule 3745-14-01, for a control period in a year prior to the year for which the NOx allowance was allocated.
[OAC rule 3745-14-01(E)(3)(e)]
- g. A NOx allowance shall not be deducted, in order to comply with the requirement under paragraph (E)(3)(a) of OAC rule 3745-14-01, for a control period in a year prior to the year for which the NOx allowance was allocated.
[OAC rule 3745-14-01(E)(3)(e)]
- h. Each ton of NOx emitted in excess of the NOx budget emission limitation, as defined in OAC rule 3745-14-01(B)(2)(yy), shall constitute a separate violation of OAC Chapter 3745-14, the Clean Air Act, and applicable Ohio law. The owners and operators of a NOx budget unit that has excess emissions in any control period shall surrender the NOx allowances required for deduction under paragraph (E)(4)(a) of OAC rule 3745-14-06 and pay any fine, penalty, or assessment or comply with any other remedy imposed under paragraph (E)(4)(c) of OAC rule 3745-14-06.
[OAC rules 3745-14-01(E)(3)(b), 3745-14-01(E)(4)(a) and 3745-14-01(E)(4)(b)]
- h. Each ton of NOx emitted in excess of the NOx budget emission limitation, as defined in OAC rule 3745-14-01(B)(2)(yy), shall constitute a separate violation of OAC Chapter 3745-14, the Clean Air Act, and applicable Ohio law. The owners and operators of a NOx budget unit that has excess emissions in any control period shall surrender the NOx allowances required for deduction under paragraph (E)(4)(a) of OAC rule 3745-14-06 and pay any fine, penalty, or assessment or comply with any other remedy imposed under paragraph (E)(4)(c) of OAC rule 3745-14-06.
[OAC rules 3745-14-01(E)(3)(b), 3745-14-01(E)(4)(a) and 3745-14-01(E)(4)(b)]
- i. hen recorded by the Administrator pursuant to OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or from a NOx budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, any NOx budget permit of the NOx budget unit by operation of law without any further review.
[OAC rule 3745-14-01(E)(3)(h)]
- i. hen recorded by the Administrator pursuant to OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or from a NOx budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, any NOx budget permit of the NOx budget unit by operation of law without any further review.
[OAC rule 3745-14-01(E)(3)(h)]
- j. Except as provided below, the Director shall revise the NOx budget permit, as necessary, in accordance with OAC rule 3745-77-08.

Each NOx budget permit is deemed to incorporate automatically the definitions of terms under paragraph (B) of OAC rule 3745-14-01 and, when recorded by the Administrator, in accordance with OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx budget units covered by the permit or the overdraft account of the NOx budget source covered by the permit.
[OAC rules 3745-14-03(D)(2) and 3745-14-03(E)(1)]

- j. Except as provided below, the Director shall revise the NOx budget permit, as necessary, in accordance with OAC rule 3745-77-08.

Each NOx budget permit is deemed to incorporate automatically the definitions of terms under paragraph (B) of OAC rule 3745-14-01 and, when recorded by the Administrator, in accordance with OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx budget units covered by the permit or the overdraft account of the NOx budget source covered by the permit.
[OAC rules 3745-14-03(D)(2) and 3745-14-03(E)(1)]

- k. The owner or operator of a NOx budget unit shall comply with the prohibitions under OAC rule 3745-14-08 (A)(5).
[OAC rule 3745-14-08(A)(5)]

- k. The owner or operator of a NOx budget unit shall comply with the prohibitions under OAC rule 3745-14-08 (A)(5).
[OAC rule 3745-14-08(A)(5)]

- l. The owners and operators of the NOx budget unit shall keep on site at the source each of the following documents for a period of five years from the date the document is created: (This period may be extended for cause, at any time prior to the end of five years, in writing by the Director or Administrator.)

i. the account certificate of representation for the NOx authorized account representative for the NOx budget unit and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with paragraph (D) of OAC rule 3745-14-02, provided that the certificate and documents shall be retained on site at the source beyond such five-year period until such documents are superseded because of the submission of a new account certificate or representation changing the NOx authorized account representative;

ii. all emission monitoring information, in accordance with OAC rule 3745-14-08;

iii. copies of all reports, compliance certifications, and other submissions and all records made or required under the NOx budget trading program; and

iv. copies of all documents used to complete a NOx budget permit application and any other submission under the NOx budget trading program or to demonstrate compliance with the requirements of the NOx budget trading program.
[OAC rule 3745-14-01(E)(5)(a)(i) through (iv)]

- l. The owners and operators of the NOx budget unit shall keep on site at the source each of the following documents for a period of five years from the date the document is created: (This period may be extended for cause, at any time prior to the end of five years, in writing by the Director or Administrator.)

i. the account certificate of representation for the NOx authorized account representative for the NOx budget unit and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with paragraph (D) of OAC rule 3745-14-02, provided that the certificate and documents shall be retained on site at the source beyond such five-year period until such documents are superseded because of the submission of a new account certificate or representation changing the NOx authorized account representative;

ii. all emission monitoring information, in accordance with OAC rule 3745-14-08;

iii. copies of all reports, compliance certifications, and other submissions and all records made or required under the NOx budget trading program; and

iv. copies of all documents used to complete a NOx budget permit application and any other submission under the NOx budget trading program or to demonstrate compliance with the requirements of the NOx budget trading program.
[OAC rule 3745-14-01(E)(5)(a)(i) through (iv)]

- m. The permittee shall operate and maintain equipment to continuously monitor and record nitrogen oxides emissions from these emissions units in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software. This includes all systems required to monitor the NOx emission rate, NOx concentration, heat input rate, and stack flow rate, in accordance with 40 CFR Parts 75.71 and 75.72.

The permittee shall comply with the initial and re-certification procedures of 40 CFR Part 75. The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous nitrogen oxides monitoring system has been certified in accordance with 40 CFR Part 75. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous nitrogen oxides monitoring system: emissions of nitrogen oxides in lb/mmBtu actual heat input on an hourly average basis, emissions of nitrogen oxides in lbs/hr, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

Whenever the monitoring system fails to meet the quality assurance or data validation requirements of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.
[OAC rules 3745-14-01(E)(2)(a), 3745-14-01(E)(5)(a)(ii), 3745-14-08(A)(2)(a) through (A)(2)(d), 3745-14-08(B)(1), and 3745-14-08(C)(1)]

- m. The permittee shall operate and maintain equipment to continuously monitor and record nitrogen oxides emissions from these emissions units in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software. This includes all systems required to monitor the NOx emission rate, NOx concentration, heat input rate, and stack flow rate, in accordance with 40 CFR Parts 75.71 and 75.72.

The permittee shall comply with the initial and re-certification procedures of 40 CFR Part 75. The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous nitrogen oxides monitoring system has been certified in accordance with 40 CFR Part 75. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous nitrogen oxides monitoring system: emissions of nitrogen oxides in lb/mmBtu actual heat input on an hourly average basis, emissions of nitrogen oxides in lbs/hr, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

Whenever the monitoring system fails to meet the quality assurance or data validation requirements of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.
[OAC rules 3745-14-01(E)(2)(a), 3745-14-01(E)(5)(a)(ii), 3745-14-08(A)(2)(a) through (A)(2)(d), 3745-14-08(B)(1), and 3745-14-08(C)(1)]

- n. The permittee shall comply with the monitoring plan requirements of 40 CFR Part 75.62, except that the monitoring plan shall also include all of the information required by Subpart H of 40 CFR Part 75.
[OAC rule 3745-14-08(E)(2)(a)]

- n. The permittee shall comply with the monitoring plan requirements of 40 CFR Part 75.62, except that the monitoring plan shall also include all of the information required by Subpart H of 40 CFR Part 75.
[OAC rule 3745-14-08(E)(2)(a)]

- o. The NOx authorized account representative of the NOx budget unit shall submit the reports and compliance certifications required under the NOx budget trading program, including those under OAC rules 3745-14-04 and 3745-14-08, to the Director and Administrator.
[OAC rule 3745-14-01(E)(5)(b)]

- o. The NOx authorized account representative of the NOx budget unit shall submit the reports and compliance certifications required under the NOx budget trading program, including those under OAC rules 3745-14-04 and 3745-14-08, to the Director and Administrator.
[OAC rule 3745-14-01(E)(5)(b)]

- p. Each submission under the NOx budget trading program shall be submitted, signed, and certified by the NOx authorized account representative for each NOx budget source on behalf of which the submission is made. Each such submission shall include the following certification statement by the NOx authorized account representative:

"I am authorized to make this submission on behalf of the owners and operators of the NOx budget sources or NOx budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

If the NOx authorized account representative for a NOx budget unit subject to an acid rain emission limitation who signed and certified any submission that is made under Subpart F or G of 40 CFR Part 75 and which includes data and information required under OAC rule 3745-14-08 or Subpart H of 40 CFR Part 75 is not the same person as the designated representative or the alternate designated representative for the unit under 40 CFR Part 72, then the submission shall also be signed by the designated representative or the alternate designated representative.
[OAC rules 3745-14-02(A)(5) and 3745-14-08(E)(1)(b)]

- p. Each submission under the NOx budget trading program shall be submitted, signed, and certified by the NOx authorized account representative for each NOx budget source on behalf of which the submission is made. Each such submission shall include the following certification statement by the NOx authorized account representative:

"I am authorized to make this submission on behalf of the owners and operators of the NOx budget sources or NOx budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

If the NOx authorized account representative for a NOx budget unit subject to an acid rain emission limitation who signed and certified any submission that is made under Subpart F or G of 40 CFR Part 75 and which includes data and information required under OAC rule 3745-14-08 or Subpart H of 40 CFR Part 75 is not the same person as the designated representative or the alternate designated representative for the unit under 40 CFR Part 72, then the submission shall also be signed by the designated representative or the alternate designated representative.
[OAC rules 3745-14-02(A)(5) and 3745-14-08(E)(1)(b)]

- q. The NOx authorized account representative shall submit quarterly reports that include all of the data and information required in Subpart H of 40 CFR Part 75 for each NOx budget unit (or group of units using a common stack) and the data and information in Subpart G of 40 CFR Part 75. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30 and October 30 of each year and shall be submitted in the manner specified in Subpart H of 40 CFR Part 75 and 40 CFR Part 75.64.
[OAC rules 3745-14-08(E)(4)(a) and 3745-14-08(E)(4)(c)(i)]
- q. The NOx authorized account representative shall submit quarterly reports that include all of the data and information required in Subpart H of 40 CFR Part 75 for each NOx budget unit (or group of units using a common stack) and the data and information in Subpart G of 40 CFR Part 75. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30 and October 30 of each year and shall be submitted in the manner specified in Subpart H of 40 CFR Part 75 and 40 CFR Part 75.64.
[OAC rules 3745-14-08(E)(4)(a) and 3745-14-08(E)(4)(c)(i)]
- r. The NOx authorized account representative shall submit to the Administrator a compliance certification in support of each quarterly report based on a reasonable inquiry of those persons with primary responsibility for ensuring that all of the unit's emissions are correctly and fully monitored. The compliance certification shall state that:
- i. the monitoring data submitted were recorded in accordance with the applicable requirements of OAC rule 3745-14-08 and 40 CFR Part 75, including the quality assurance procedures and specifications; and
 - ii. for a unit with add-on NOx emission controls and for all hours where data are substituted in accordance with 40 CFR Part 75.34(a)(1), the add-on emission control were operating within the range of parameters listed in the quality assurance program under Appendix B of 40 CFR Part 75 and the substitute values do not systematically underestimate the NOx emissions.
[OAC rule 3745-14-08(E)(4)(d)(i) and (ii)]
- r. The NOx authorized account representative shall submit to the Administrator a compliance certification in support of each quarterly report based on a reasonable inquiry of those persons with primary responsibility for ensuring that all of the unit's emissions are correctly and fully monitored. The compliance certification shall state that:
- i. the monitoring data submitted were recorded in accordance with the applicable requirements of OAC rule 3745-14-08 and 40 CFR Part 75, including the quality assurance procedures and specifications; and
 - ii. for a unit with add-on NOx emission controls and for all hours where data are substituted in accordance with 40 CFR Part 75.34(a)(1), the add-on emission control were operating within the range of parameters listed in the quality assurance program under Appendix B of 40 CFR Part 75 and the substitute values do not systematically underestimate the NOx emissions.
[OAC rule 3745-14-08(E)(4)(d)(i) and (ii)]
- s. The NOx authorized account representative for a NOx budget unit shall submit written notice of monitoring system certification and re-certification test dates to the Director and the Administrator in accordance with 40 CFR Part 75.61. The NOx authorized account representative shall submit a certification application to the Administrator, U.S. EPA, Region V Office, and the Director within forty-five days after completing all initial or re-certification tests required under paragraph (B) of OAC rule 3745-14-08, including the information required under Subpart H of 40 CFR Part 75.
[OAC rules 3745-14-08(D) and 3745-14-08(E)(3)]
- s. The NOx authorized account representative for a NOx budget unit shall submit written notice of monitoring system certification and re-certification test dates to the Director and the Administrator in accordance with 40 CFR Part 75.61. The NOx authorized account representative shall submit a certification application to the Administrator, U.S. EPA, Region V Office, and the Director within forty-five days after completing all initial or re-certification tests required under paragraph (B) of OAC rule 3745-14-08, including the information required under Subpart H of 40 CFR Part 75.
[OAC rules 3745-14-08(D) and 3745-14-08(E)(3)]
- t. For each control period in which one or more NOx budget units at a source are subject to the NOx budget emission limitation, the NOx authorized account representative of the source shall submit to the Director and the Administrator, by November 30 of that year, a compliance certification report for each source

covering all such units.

The NOx authorized account representative shall include the following elements in the compliance certification report, in a format prescribed by the Administrator, concerning each unit at the source and subject to the NOx budget emission limitation for the control period covered by the report:

- i. identification of each NOx budget unit;
 - ii. at the NOx authorized account representative's option, the serial numbers of the NOx allowances that are to be deducted from each unit's compliance account under paragraph (E) of OAC rule 3745-14-06 for the control period;
 - iii. at the NOx authorized account representative's option, for units sharing a common stack and having NOx emissions that are not monitored separately or apportioned in accordance with OAC rule 3745-14-08, the percentage of allowances that is to be deducted from each unit's compliance account under paragraph (E)(5) of OAC rule 3745-14-06; and
 - iv. the compliance certification under paragraph (A)(3) of OAC rule 3745-14-04. [OAC rules 3745-14-04(A)(1) and 3745-14-04(A)(2)]
- t. For each control period in which one or more NOx budget units at a source are subject to the NOx budget emission limitation, the NOx authorized account representative of the source shall submit to the Director and the Administrator, by November 30 of that year, a compliance certification report for each source covering all such units.

The NOx authorized account representative shall include the following elements in the compliance certification report, in a format prescribed by the Administrator, concerning each unit at the source and subject to the NOx budget emission limitation for the control period covered by the report:

- i. identification of each NOx budget unit;
 - ii. at the NOx authorized account representative's option, the serial numbers of the NOx allowances that are to be deducted from each unit's compliance account under paragraph (E) of OAC rule 3745-14-06 for the control period;
 - iii. at the NOx authorized account representative's option, for units sharing a common stack and having NOx emissions that are not monitored separately or apportioned in accordance with OAC rule 3745-14-08, the percentage of allowances that is to be deducted from each unit's compliance account under paragraph (E)(5) of OAC rule 3745-14-06; and
 - iv. the compliance certification under paragraph (A)(3) of OAC rule 3745-14-04. [OAC rules 3745-14-04(A)(1) and 3745-14-04(A)(2)]
- u. In the compliance certification report under Section A.2.1.iv above, the NOx authorized account representative shall certify, based upon reasonable inquiry of those persons with the primary responsibility for operating the source and the NOx budget units at the source in compliance with the NOx budget trading program, whether each NOx budget unit for which the compliance certification is submitted was operated during the calendar year covered by the report in compliance with the requirements of the NOx budget trading program applicable to the unit, including all the following:
- i. whether the unit was operated in compliance with the NOx budget emission limitation;
 - ii. whether the monitoring plan that governs the unit has been maintained to reflect the actual operation and monitoring of the unit, and contains all information necessary to attribute NOx emissions to the unit, in accordance with OAC rule 3745-14-08;
 - iii. whether all the NOx emissions from the unit, or group of units (including the unit) using a common stack, were monitored or accounted for through the missing data procedures and reported in the quarterly monitoring reports, including whether conditional data were reported in the quarterly reports in accordance with OAC rule 3745-14-08, and if conditional data were reported, the permittee shall indicate whether the status of all conditional data has been resolved and all necessary quarterly report submissions have been made; and
 - iv. whether the facts that form the basis for certification under OAC rule 3745-14-08 of each monitor at the unit or group of units (including the unit) using a common stack, or for using an excepted monitoring method or alternative monitoring method approved under OAC rule 3745-14-08, if any, have changed.
- u. If a change is required to be reported under Section A.2.u.iv above, specify the nature of the change, the reason for the change, when the change occurred, and how the unit's compliance status was determined subsequent to the change, including what method was used to determine emissions when a change mandated the need for monitor re-certification. [OAC rule 3745-14-04(A)(3)]

- u. In the compliance certification report under Section A.2.1.iv above, the NOx authorized account representative shall certify, based upon reasonable inquiry of those persons with the primary responsibility for operating the source and the NOx budget units at the source in compliance with the NOx budget trading program, whether each NOx budget unit for which the compliance certification is submitted was operated during the calendar year covered by the report in compliance with the requirements of the NOx budget trading program applicable to the unit, including all the following:
- i. whether the unit was operated in compliance with the NOx budget emission limitation;

- ii. whether the monitoring plan that governs the unit has been maintained to reflect the actual operation and monitoring of the unit, and contains all information necessary to attribute NOx emissions to the unit, in accordance with OAC rule 3745-14-08;
 - iii. whether all the NOx emissions from the unit, or group of units (including the unit) using a common stack, were monitored or accounted for through the missing data procedures and reported in the quarterly monitoring reports, including whether conditional data were reported in the quarterly reports in accordance with OAC rule 3745-14-08, and if conditional data were reported, the permittee shall indicate whether the status of all conditional data has been resolved and all necessary quarterly report submissions have been made; and
 - iv. whether the facts that form the basis for certification under OAC rule 3745-14-08 of each monitor at the unit or group of units (including the unit) using a common stack, or for using an excepted monitoring method or alternative monitoring method approved under OAC rule 3745-14-08, if any, have changed.
- u. If a change is required to be reported under Section A.2.u.iv above, specify the nature of the change, the reason for the change, when the change occurred, and how the unit's compliance status was determined subsequent to the change, including what method was used to determine emissions when a change mandated the need for monitor re-certification.
[OAC rule 3745-14-04(A)(3)]
 - v. The NOx authorized account representative shall submit a complete NOx budget permit renewal application for the NOx budget source covering the NOx budget units at the source in accordance with paragraph (E) of OAC rule 3745-77-08.
[OAC rule 3745-14-03(B)(3)(a)]
 - v. The NOx authorized account representative shall submit a complete NOx budget permit renewal application for the NOx budget source covering the NOx budget units at the source in accordance with paragraph (E) of OAC rule 3745-77-08.
[OAC rule 3745-14-03(B)(3)(a)]
 - w. The emission measurements recorded and reported in accordance with OAC rule 3745-14-08 shall be used to determine compliance by the unit with the NOx budget emission limitation under paragraph (E)(3) of OAC rule 3745-14-01.
[OAC rule 3745-14-01(E)(2)(b)]
 - w. The emission measurements recorded and reported in accordance with OAC rule 3745-14-08 shall be used to determine compliance by the unit with the NOx budget emission limitation under paragraph (E)(3) of OAC rule 3745-14-01.
[OAC rule 3745-14-01(E)(2)(b)]
 - x. The permittee shall develop and maintain a written quality assurance/quality control plan for each continuous NOx monitoring system designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on-site and available for inspection during regular office hours.
[OAC rules 3745-14-08(A)(2)(c) and 3745-14-08(A)(2)(d)]
 - x. The permittee shall develop and maintain a written quality assurance/quality control plan for each continuous NOx monitoring system designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on-site and available for inspection during regular office hours.
[OAC rules 3745-14-08(A)(2)(c) and 3745-14-08(A)(2)(d)]

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

F023 - Continuous caster Tundish dumping and relining
 F024 - Blast furnace casthouse baghouse dust handling
 P004 - #1 Lee Wilson portable anneal unit
 P030 - 56" mill heat retention box #1
 P031 - 56" mill heat retention box #2
 P041 - #2 Lee Wilson portable anneal unit
 P042 - #3 Lee Wilson portable anneal unit
 P043 - #4 Lee Wilson portable anneal unit
 P044 - #5 Lee Wilson portable anneal unit
 P045 - #6 Lee Wilson portable anneal unit
 P046 - #7 Lee Wilson portable anneal unit
 P047 - #8 Lee Wilson portable anneal unit
 P048 - #9 Lee Wilson portable anneal unit
 P049 - #10 Lee Wilson portable anneal unit

P050 - #11 Lee Wilson portable anneal unit
P051 - #12 Lee Wilson portable anneal unit
P052 - #13 Lee Wilson portable anneal unit
P053 - #14 Lee Wilson portable anneal unit
P054 - #15 Lee Wilson portable anneal unit
P055 - #16 Lee Wilson portable anneal unit
P056 - #17 Lee Wilson portable anneal unit
P057 - #18 Lee Wilson portable anneal unit
P058 - #19 Lee Wilson portable anneal unit
P059 - #20 Lee Wilson portable anneal unit
P060 - #21 Lee Wilson portable anneal unit
P061 - #22 Lee Wilson portable anneal unit
P062 - #23 Lee Wilson portable anneal unit
P063 - #24 Lee Wilson portable anneal unit
P064 - #25 Lee Wilson portable anneal unit
P065 - #26 Lee Wilson portable anneal unit
P066 - #27 Lee Wilson portable anneal unit
P067 - #28 Lee Wilson portable anneal unit
P068 - #29 Lee Wilson portable anneal unit
P069 - #30 Lee Wilson portable anneal unit
P070 - #31 Lee Wilson portable anneal unit
P071 - #32 Lee Wilson portable anneal unit
P072 - #33 Lee Wilson portable anneal unit
P073 - #34 Lee Wilson portable anneal unit
P074 - #35 Lee Wilson portable anneal unit
P075 - #36 Lee Wilson portable anneal unit
P076 - Spare Lee Wilson direct-fired portable anneal unit
P077 - #1 Salem portable anneal unit
P078 - #2 Salem portable anneal unit
P079 - #3 Salem portable anneal unit
P080 - #4 Salem portable anneal unit
P081 - #5 Salem portable anneal unit
P082 - #6 Salem portable anneal unit
P083 - #7 Salem portable anneal unit
P084 - #8 Salem portable anneal unit
P085 - #9 Salem portable anneal unit
P086 - #10 Salem portable anneal unit
P087 - #11 Salem portable anneal unit
P088 - #12 Salem portable anneal unit
P089 - Dx gas generators (3)
P090 - Vacuum degasser cooling tower
P091 - Continuous caster machine cooling tower
P092 - Continuous caster spray chamber cooling tower
P093 - HSM cooling tower
T007 - 56" mill 50,000-gallon tank containing waste oil
T008 - 56" mill 500,000-gallon tank containing waste oil
T009 - BOF shop 100,000-gallon tank for diesel fuel storage
Z005 - No. 1 56" mill scale pit
Z006 - No. 2 56" mill scale pit
Z009 - Blast furnace scrubber water settling chamber/clarifiers
Z010 - Blast furnace cooling towers (2)
Z011 - Blast furnace emergency power generator
Z012 - Bottle car refractory dryer
Z015 - Continuous caster scale pit
Z016 - HSM 16,000-gallon Morgue oil tanks (2)
Z017 - HSM 6000-gallon stoddard storage tank
Z018 - 56" hot strip mill stands and sleuce pit
Z020 - HSM cooling water lagoon
Z021 - No. 5 lagoon
Z022 - No. 6 and 6A lagoons
Z023 - Tandem mill 10,000-gallon solvent tanks (2)
Z024 - Cold finishing ship oil tanks (3)
Z025 - Coated products 12,830-gallon HCl tank
Z026 - Coated products Amalene Dx gas generators
Z027 - Coated products 5000-gallon core plate coating tanks (2)
Z028 - Carpenter shop sawdust cyclone unloading w/enclosure
Z029 - Oil house petroleum lube storage tanks (13) <10,000 gallons
Z031 - Cold cleaners w/surface areas <10 square feet (32)
Z032 - Locomotive shop cold cleaner
Z033 - Caster shop cold cleaner
Z034 - Tractor shop cold cleaner
Z035 - Transportation shop cold cleaner
Z036 - R & F shop cold cleaner
Z037 - Coated products shop cold cleaner
Z038 - Engineering building emergency generator
Z039 - Central waste water treatment facility clarifier
Z040 - Boiler house bead blaster
Z041 - Kish pit
Z042 - No. 1 Ebner hydrogen anneal furnace
Z043 - No. 2 Ebner hydrogen anneal furnace
Z044 - R & F hot maintenance cold cleaner
Z045 - R & F hot cold cleaner
Z046 - R & F #5 pickle cold cleaner
Z047 - R & F #6 pickle cold cleaner
Z048 - No. 3 Ebner hydrogen anneal furnace

Z049 - No. 2 galvanize line waste pickle liquor sump
Z050 - No. 4 Ebner hydrogen anneal furnace
Z051 - No. 5 Ebner hydrogen anneal furnace

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within a Permit to Install for the emissions unit.

The following insignificant emissions units are located at this facility:

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P055 - #16 Lee Wilson portable anneal unit
P056 - #17 Lee Wilson portable anneal unit
P057 - #18 Lee Wilson portable anneal unit
P058 - #19 Lee Wilson portable anneal unit
P059 - #20 Lee Wilson portable anneal unit
P060 - #21 Lee Wilson portable anneal unit
P061 - #22 Lee Wilson portable anneal unit
P062 - #23 Lee Wilson portable anneal unit
P063 - #24 Lee Wilson portable anneal unit
P064 - #25 Lee Wilson portable anneal unit
P065 - #26 Lee Wilson portable anneal unit
P066 - #27 Lee Wilson portable anneal unit
P067 - #28 Lee Wilson portable anneal unit
P068 - #29 Lee Wilson portable anneal unit
P069 - #30 Lee Wilson portable anneal unit
P070 - #31 Lee Wilson portable anneal unit
P071 - #32 Lee Wilson portable anneal unit
P072 - #33 Lee Wilson portable anneal unit
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Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within a Permit to Install for the emissions unit.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: B001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
492 mmBtu/hr boiler fired with coal, natural gas, blast furnace gas, and coke oven gas with a baghouse for controlling particulate emissions	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)(1)	See A.I.2.a and A.I.2.c below.
	OAC rule 3745-17-10(C)(1)	See A.I.2.b below.
	OAC rule 3745-18-84(J)	Sulfur dioxide emissions shall not exceed 3.9 lbs/mmBtu actual heat input. See A.III.5 and A.III.6 below.
	40 CFR, Part 63, Subpart DDDDD	See Section A.I.2.d.

2. Additional Terms and Conditions

- a. Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input except when burning coal, when co-firing coal with any gaseous fuel, or when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.
- b. Particulate emissions shall not exceed 0.10 pound per million Btu of actual heat input when burning coal or when co-firing coal with any gaseous fuels. This limit was obtained from curve P-1 in Figure 1 of OAC rule 3745-17-10 using a total heat input of 879 mmBtu/hr, which is the combined total heat input from emissions units B001 and B002.
- c. Particulate emissions shall not exceed 0.040 pound per million Btu of actual heat input when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.
- d. U.S. EPA anticipates proposing the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers and Process Heaters, at 40 CFR, Part 63, Subpart DDDDD, in November of 2002. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.5, A.IV.6, and A.IV.7 for required reporting pertaining to these requirements.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation.
2. The coal burned in this emissions unit shall have a sulfur content, on a dry basis, that is sufficient to comply with the allowable sulfur dioxide emission limitation of 3.9 pounds sulfur dioxide/mmBtu actual heat input.

Compliance with the above-mentioned specification shall be based upon the analytical results for the composite sample of coal collected during each calendar month.
3. The permittee shall burn only natural gas, coal, blast furnace gas, and coke oven gas in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall install, operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13. See A.VI.1.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, operating manual(s), and/or the permittee's operational experience for similar sources. The permittee shall record the pressure drop across the baghouse on daily basis when the emissions unit is operating.
3. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for sulfur content shall be the most recent version of: Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isooperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

4. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content and heat content, and the average sulfur dioxide emission rate for coal, recorded as pounds SO₂/MMBtu actual heat input.
5. Monitoring and record keeping for the sulfur content is not required for coke oven gas because the sulfur dioxide emission rate from the burning of undesulfurized coke oven gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
6. Monitoring and record keeping for the sulfur content is not required for blast furnace gas because the sulfur dioxide emission rate from the burning of blast furnace gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
7. For each day during which the permittee burns a fuel other than natural gas, coal, blast furnace gas, and coke oven gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
3. Quarterly reports shall be submitted concerning the analytical results of the composite coal samples and the quantities of the coal received for this emissions unit.

The quarterly reports shall include the following information for each month during the calendar quarter:

 - a. the total quantity of coal received (tons);
 - b. the average sulfur content (percent) of the coal received;
 - c. the average heat content (Btu/pound) of the coal received; and
 - d. the average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received.

These quarterly reports shall be submitted by February 15, May 15, August 15 and November 15 of each year, unless otherwise specified by the appropriate Ohio EPA District Office or local air agency, and shall cover the data obtained during the previous calendar quarters.
4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, coal, blast furnace gas, and/or coke oven gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
5. The permittee will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers and Process Heaters, at 40 CFR, Part 63, Subpart DDDDD. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR, Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.
 - a. If the final MACT Standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S. EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.
 1.
 - i. For a new affected source, the anticipated date of startup of operation.
 - ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.
 - iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.
 - iv. For each affected emission point or group of affected emission points, an identification of control technology in place.
 - v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.
 - vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR, Part 63.
 - b. The Part II application for a MACT determination may, but is not required to, contain the following information:
 - i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.
 - ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.
 - iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
7. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:
 - a. Within 120 days after promulgation of 40 CFR, Part 63, Subpart DDDDD, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - i. the name and mailing address of the permittee;
 - ii. the physical location of the source if it is different from the mailing address;
 - iii. identification of the relevant MACT standard and the permittee's compliance date;

- iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
- b. Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart DDDDD, the permittee shall submit a notification of compliance status that contains the following information:
- i. the methods used to determine compliance;
 - ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart DDDDD;
 - v. an analysis demonstrating whether the affected source is a major source or an area source;
 - vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
 - vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart DDDDD.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input except when burning coal, when co-firing coal with any gaseous fuel, or when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.

Applicable Compliance Method:

 - (i) To determine the actual particulate emission rate for natural gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu}) = 0.0018 \text{ lb/mmBtu}$$

Where:

E = particulate emission rate from natural gas, in lb/mmBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate matter from burning natural gas, from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.
 - (ii) To determine the particulate emission rate for coke oven gas, the permittee may use the emission factor of 0.012 lb particulate/mmBtu from AP42, Section 12.5 Iron and Steel Production, Table 12.5-1, 10/86.
 - (iii) If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

c. Emission Limitation:

Particulate emissions shall not exceed 0.10 pound per million Btu of actual heat input when burning coal or co-firing coal with any gaseous fuel.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

d. Emission Limitation:

Particulate emissions shall not exceed 0.040 pound per million Btu of actual heat input when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.

Applicable Compliance Method:

- (i) To determine the actual particulate emission rate for natural gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu}) = 0.0018 \text{ lb/mmBtu}$$

Where:

E = particulate emission rate from natural gas, in lb/mmBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate matter from burning natural gas, from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

- (ii) To determine the particulate emission rate for coke oven gas, the permittee may use the emission factor of 0.012 lb particulate/mmBtu from AP42, Section 12.5 Iron and Steel Production, Table 12.5-1, 10/86.

- (iii) The permittee may use a value of 0.015 lb particulate/mmBtu for the particulate emission rate for blast furnace gas. The value of 0.015 lb/mmBtu was obtained from emission testing on 10/21/91 of emissions unit B004 while burning only blast furnace gas.

- (iv) If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

e. Emission Limitation:

Sulfur dioxide emissions shall not exceed 3.9 lbs/mmBtu actual heat input.

Applicable Compliance Method:

- (i) The record keeping in Section A.III.2 of these terms and conditions shall be used to determine compliance with the SO₂ emission limitation when burning solid fuels.
- (ii) Testing for SO₂ from natural gas is not required because the sulfur dioxide emission rate from the burning of natural gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
- (iii) Testing for SO₂ from coke oven gas is not required because the sulfur dioxide emission rate for burning desulfurized coke oven gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
- (iv) Testing for SO₂ from blast furnace gas is not required because it does not contain measurable quantities of sulfur compounds according to "Steam", 39th Edition, The Babcock & Wilcox Company, 1978, p.5-20, and "Air Pollution Engineering Manual", Air & Waste Management Association, 1992, p. 650.
- (v) If required, the permittee shall demonstrate compliance with this emission rate, while burning coal, in accordance with 40 CFR Part 60, Appendix A, Methods 6 and 6C and the procedures in OAC rule 3745-18-04.
- (vi) If required, the permittee shall demonstrate compliance with this emission rate, while burning natural gas, in accordance with 40 CFR Part 60, Appendix A, Methods 6 and 6C and the procedures in OAC rule 3745-18-04.
- (vii) If required, the permittee shall demonstrate compliance with this emission rate, while burning coke oven gas, in accordance with 40 CFR Part 60, Appendix A, Methods 6 and 6C and the procedures in OAC rule 3745-18-04.

- (viii) If required, the permittee shall demonstrate compliance with this emission rate, while burning blast furnace gas, in accordance with 40 CFR Part 60, Appendix A, Methods 6 and 6C and the procedures in OAC rule 3745-18-04.
- 2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after issuance of this permit, between 2 and 3 years after issuance of this permit, and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limit for particulate matter.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- 3. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

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VI. Miscellaneous Requirements

- 1. Within three months of the issuance of this permit, the permittee shall install equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and Section A.III.1 of these terms and conditions.

In accordance with 40 CFR Part 51, Appendix P, and OAC rule 3745-17-03(C), the permittee was required to install equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit by January 31, 1998. Until such equipment is installed and operated, the facility is in violation of 40 CFR Part 51, Appendix P, and OAC rule 3745-17-03(C).

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Facility ID: 0278000463 Emissions Unit ID: B001 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: B002 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
387 mmBtu/hr boiler fired with natural gas, blast furnace gas, coke oven gas, and number 6 fuel oil	OAC rule 3745-17-07(A) OAC rule 3745-17-10(B)(1) OAC rule 3745-18-84(J)	Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule. See A.I.2.a and A.I.2.b below. Sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu actual heat input.
	40 CFR, Part 63, Subpart DDDDD	See Section A.I.2.c.

2. Additional Terms and Conditions

- a. Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input except when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.
- b. Particulate emissions shall not exceed 0.040 pound per million Btu of actual heat input when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.

- c. U.S. EPA anticipates proposing the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers and Process Heaters, at 40 CFR, Part 63, Subpart DDDDD, in November of 2002. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.3, A.IV.4, and A.IV.5 for required reporting pertaining to these requirements.

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II. Operational Restrictions

1. The permittee shall burn only natural gas, blast furnace gas, coke oven gas, and number 6 fuel oil in this emissions unit.
2. The quality of the oil burned in this emissions unit shall meet a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 pounds per million Btu of actual heat input.

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III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, blast furnace gas, coke oven gas, and number 6 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. Monitoring and record keeping for sulfur content is not required for blast furnace gas because the sulfur dioxide emission rate from the burning of blast furnace gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
3. Monitoring and record keeping for sulfur content is not required for coke oven gas because the sulfur dioxide emission rate from the burning of coke oven gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
4. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analysis for sulfur content and heat content in accordance with the most recent versions of the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.
5. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).)

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, blast furnace gas, coke oven gas, and/or number 6 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Ohio EPA Northeast District Office in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rate for each shipment of oil. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 45 days after the deviation occurs.
3. The permittee will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers and Process Heaters, at 40 CFR, Part 63, Subpart DDDDD. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR, Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.
 - a. If the final MACT Standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S. EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.
 1.
 - i. For a new affected source, the anticipated date of startup of operation.
 - ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.
 - iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.

- iv. For each affected emission point or group of affected emission points, an identification of control technology in place.
 - v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.
 - vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR, Part 63.
 - b. The Part II application for a MACT determination may, but is not required to, contain the following information:
 - i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.
 - ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.
 - iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
5. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:
- a. Within 120 days after promulgation of 40 CFR, Part 63, Subpart DDDDD, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - i. the name and mailing address of the permittee;
 - ii. the physical location of the source if it is different from the mailing address;
 - iii. identification of the relevant MACT standard and the permittee's compliance date;
 - iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
 - b. Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart DDDDD, the permittee shall submit a notification of compliance status that contains the following information:
 - i. the methods used to determine compliance;
 - ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart DDDDD;
 - v. an analysis demonstrating whether the affected source is a major source or an area source;
 - vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
 - vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart DDDDD.

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V. Testing Requirements

- 1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - Visible particulate emissions shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input except when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.

Applicable Compliance Method:

- (i) To determine the actual particulate emission rate for natural gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu}) = 0.0018 \text{ lb/mmBtu}$$

Where:

E = particulate emission rate from natural gas, in lb/mmBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate matter from burning natural gas, from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

- (ii) To determine the particulate emission rate for coke oven gas, the permittee may use the emission factor of 0.012 lb particulates/mmBtu from AP42, Section 12.5 Iron and Steel Production, Table 12.5-1, 10/86.
- (iii) To determine the particulate emission rate for number 6 fuel oil, the permittee may use the emission factor of [9.19 x (S)] + 3.22 lb particulates/10³ gallons from AP42, Section 1.3 Fuel Oil Combustion, Table 1.3-1, 9/98.
- (iv) If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

c. Emission Limitation:

Particulate emissions shall not exceed 0.040 pound per million Btu of actual heat input when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.

Applicable Compliance Method:

- (i) To determine the actual particulate emission rate for natural gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu}) = 0.0018 \text{ lb/mmBtu}$$

Where:

E = particulate emission rate from natural gas, in lb/mmBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate matter from burning natural gas, from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

- (ii) To determine the particulate emission rate for coke oven gas, the permittee may use the emission factor of 0.012 lb particulate/mmBtu from AP42, Section 12.5 Iron and Steel Production, Table 12.5-1, 10/86.
- (iii) The permittee may use a value of 0.015 lb particulate/mmBtu for the particulate emission rate for blast furnace gas. The value of 0.015 lb/mmBtu was obtained from emission testing on 10/21/91 of emissions unit B004 while burning only blast furnace gas.
- (iv) If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

d. Emission Limitation:

Sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission rate in accordance with 40 CFR Part 60, Appendix A, Methods 6 and 6C and the procedures in OAC rule 3745-18-04.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: B002 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: B004 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
469 mmBtu/hr boiler fired with natural gas, blast furnace gas, and coke oven gas	OAC rule 3745-17-07(A)	The emission limitation established pursuant to this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart D.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input except when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels. The particulate emission limitation established pursuant to this rule for burning blast furnace gas is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and PSD permit #5-79-A-8.
	OAC rule 3745-31-05(A)(3) PTI 02-486	Particulate emissions shall not exceed 0.030 pound per million Btu of actual heat input when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels. The particulate emission limitation established pursuant to this rule for natural gas and coke oven gas is less stringent than the emission limitation established pursuant to OAC rule 3745-17-10(B)(1).
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-10(B)(1) (for gaseous fuels other than blast furnace gas) and 40 CFR Part 60, Subpart D.
		Sulfur dioxide emissions shall not exceed 0.2 pound per million Btu of actual heat input.
	OAC rule 3745-18-84(J)	NOx emissions shall not exceed 0.2 pound per million Btu of actual heat input.
	40 CFR Part 60, Subpart D	The emission limitation established pursuant to this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and PSD permit #5-79-A-8. Visible particulate emissions shall not exceed 20 percent opacity except for one 6-minute period per hour of not more than 27 percent opacity.
	40 CFR 52.21 PSD permit #5-79-A-8	The emission limitations established pursuant to this rule for particulates, sulfur dioxide, and NOx emissions are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). The emission limitations established pursuant to this rule for sulfur dioxide and NOx emissions are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation established pursuant to this

rule for particulate emissions is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

40 CFR, Part 63, Subpart DDDDD See Section A.I.2.a.

2. Additional Terms and Conditions

- a. U.S. EPA anticipates proposing the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers and Process Heaters, at 40 CFR, Part 63, Subpart DDDDD, in November of 2002. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Sections A.IV.4, A.IV.5, and A.IV.6 for required reporting pertaining to these requirements.

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II. Operational Restrictions

1. The permittee shall burn in this emissions unit only natural gas, blast furnace gas, and desulfurized coke oven gas with a concentration of H₂S less than 35 grains per 100 dry standard cubic feet (as an average for each rolling, 3-hour period).
2. The permittee shall not burn undesulfurized coke oven gas in this emissions unit.
3. This emissions unit can be fired with desulfurized coke oven gas produced by the ISG Warren facility, facility ID 02-78-00-0648. In accordance with 40 CFR 52.21 (Approval to Construct, Prevention of Significant Deterioration of Air Quality, September 27, 1977) and a Consent Order (Case No. C78-1659), the following coke oven gas quality specification applies to coke oven gas produced by coke battery number 4 at the ISG Warren facility, facility ID 02-78-00-0648, emissions unit B901:

No coke oven gas from coke battery number 4 at the ISG Warren facility, facility ID 02-78-00-0648, shall be burned unless it contains a concentration of sulfur compounds, expressed as H₂S, of less than 35 grains per 100 dry standard cubic feet (dscf) of coke oven gas produced. The limit of 35 grains per 100 dscf includes the sulfur concentration in the desulfurized coke oven gas and the sulfur concentration in the desulfurization tail gas, combined, measured by continuous emissions monitoring at the desulfurization plant at the ISG Warren facility.

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III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, blast furnace gas, and desulfurized coke oven gas with a concentration of H₂S less than 35 grains per 100 dry standard cubic feet, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall operate and maintain equipment to continuously monitor and record the nitrogen oxides emissions from this emissions unit in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous nitrogen oxides monitoring system has been certified in accordance with 40 CFR Part 60. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous nitrogen oxides monitoring system: emissions of nitrogen oxides in lb/mmBtu actual heat input (as an average over each hour of operation), lbs/hr (as an average over each hour of operation), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

The permittee shall maintain daily records of the total actual heat input values as determined through F-Factor and carbon dioxide/oxygen calculations as specified in 40 CFR Part 60, Appendix A, Method 19.

3. Monitoring and record keeping for sulfur content is not required for blast furnace gas or natural gas because the sulfur dioxide emission rate from the burning of blast furnace gas or natural gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
4. The permittee shall continuously monitor and record the sulfur content of the desulfurized coke oven gas burned in this emissions unit to ensure that the concentration of sulfur compounds is less than 35 grains per 100 dry standard cubic feet (as an average for each rolling, 3-hour period). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous sulfur dioxide and total reduced sulfur monitoring systems including, but not limited to, the grains of hydrogen sulfide per 100 dry standard cubic feet (dscf) for the desulfurized coke oven gas on a daily average basis, based upon the average emission rate for the actual hours of operation for this emissions unit during each calendar day.

In lieu of the above requirement, the permittee may accept the coke oven gas supplier's monitoring and record keeping for sulfur content in the desulfurized coke oven gas if said monitoring and record keeping meets the requirements of 40 CFR Part 60.13.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, blast furnace gas, and/or desulfurized coke oven gas was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each rolling, 3-hour period during which the concentration of H₂S in the desulfurized coke oven gas burned in this emissions unit exceeded 35 grains per 100 dscf, and the actual H₂S content for each such 3-hour period.
3. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all 3-hour average nitrogen oxides emission values in excess of the applicable nitrogen oxides emission limitation (lb/mmBtu).

The reports shall also document any continuous nitrogen oxides monitoring system downtime while the emissions unit was on line (date, time, duration and reason), along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

4. The permittee will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers and Process Heaters, at 40 CFR, Part 63, Subpart DDDDD. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR, Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.
 - a. If the final MACT Standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S. EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.
 1.
 - i. For a new affected source, the anticipated date of startup of operation.
 - ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.
 - iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.
 - iv. For each affected emission point or group of affected emission points, an identification of control technology in place.
 - v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.
 - vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR, Part 63.
 - b. The Part II application for a MACT determination may, but is not required to, contain the following information:
 - i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.
 - ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.
 - iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
6. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:
 - a. Within 120 days after promulgation of 40 CFR, Part 63, Subpart DDDDD, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated

standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:

- i. the name and mailing address of the permittee;
 - ii. the physical location of the source if it is different from the mailing address;
 - iii. identification of the relevant MACT standard and the permittee's compliance date;
 - iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
- b. Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart DDDDD, the permittee shall submit a notification of compliance status that contains the following information:
- i. the methods used to determine compliance;
 - ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart DDDDD;
 - v. an analysis demonstrating whether the affected source is a major source or an area source;
 - vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
 - vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart DDDDD.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity except for one 6-minute period per hour of not more than 27 percent opacity.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input except when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.

Applicable Compliance Method:

 - (i) To determine the actual particulate emission rate from burning natural gas, the following equation shall be used:

$$E (\text{lb/mmBtu}) = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu}) = 0.0018 \text{ lb/mmBtu}$$

Where:

E = particulate emission rate from burning natural gas, in lb/mmBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate material from burning natural gas from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

- (ii) To determine the particulate emission rate for coke oven gas, the permittee may use the emission factor of 0.012 lb particulate/mmBtu from AP42, Section 12.5 Iron and Steel Production, Table 12.5-1, 10/86.
- (iii) If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

c. Emission Limitation:

Particulate emissions shall not exceed 0.030 pound per million Btu of actual heat input when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.

Applicable Compliance Method:

- (i) To determine the actual particulate emission rate from burning natural gas, the following equation shall be used:

$$E \text{ (lb/mmBtu)} = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu}) = 0.0018 \text{ lb/mmBtu}$$

Where:

E = particulate emission rate from burning natural gas, in lb/mmBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate material from burning natural gas from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

- (ii) To determine the particulate emission rate for coke oven gas, the permittee may use the emission factor of 0.012 lb particulate/mmBtu from AP42, Section 12.5 Iron and Steel Production, Table 12.5-1, 10/86.
- (iii) The permittee shall use a value of 0.015 lb particulate/mmBtu for the particulate emission rate for blast furnace gas. The value of 0.015 lb/mmBtu was obtained from emission testing on 10/21/91 of emissions unit B004 while burning only blast furnace gas.
- (iv) If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

d. Emission Limitation:

Sulfur dioxide emissions shall not exceed 0.2 pound per million Btu of actual heat input.

Applicable Compliance Method:

- (i) To determine the actual emission rate for SO₂ from natural gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (0.6 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu}) = 0.0006 \text{ lb/mmBtu}$$

Where:

E = SO₂ emission rate from natural gas, in lb/mmBtu;

0.6 lb/10⁶ scf = emission factor for SO₂ from burning natural gas from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

- (ii) To determine the actual emission rate for SO₂ from coke oven gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (\text{H}_2\text{S content}) \times (1 \text{ lb}/7000 \text{ grains}) \times (1 \text{ scf}/580 \text{ Btu}) \times (64 \text{ SO}_2/34 \text{ H}_2\text{S}) \times (1,000,000 \text{ Btu/mmBtu})$$

Where:

E = SO₂ emission rate from coke oven gas, in lb/mmBtu;

H₂S content = grains of H₂S in 100 scf of desulfurized coke oven gas recorded in Section A.III.4;

1 lb/7000 grains = conversion from pounds to grains;

1 scf/580 Btu = the heat value of 1 scf of coke oven gas;

64 SO₂/34 H₂S = the ratio of grams per mole of SO₂ to mole of H₂S; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

- (iii) Testing for SO₂ from blast furnace gas is not required because it does not contain measurable quantities of sulfur compounds according to "Steam", 39th Edition, The Babcock & Wilcox Company, 1978, p.5-20, and "Air Pollution Engineering Manual", Air & Waste Management Association, 1992, p. 650.
- (iv) If required, the permittee shall demonstrate compliance with this emission rate while burning coke oven gas in accordance with 40 CFR Part 60, Appendix A, Methods 6 and 6C and the procedures in OAC rule 3745-18-04.

e. Emission Limitation:

NO_x emissions shall not exceed 0.2 pound per million Btu of actual heat input.

Applicable Compliance Method:

- (i) The data from the continuous nitrogen oxides monitoring system may be used to demonstrate compliance with the lb/mmBtu emission limitation.
- (ii) If required, the permittee shall demonstrate compliance with this emission rate in accordance with 40 CFR Part 60, Appendix A, Method 7E.

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VI. **Miscellaneous Requirements**

- 1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

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Facility ID: 0278000463 Emissions Unit ID: B004 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: F001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Roadways and parking areas: approximately 8.65 miles of paved roadways and parking areas and approximately 5.78 miles of unpaved roadways and parking areas		
Paved roadways and parking areas (see Section A.I.2.a below)	OAC rule 3745-17-07(B)(4)	There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period, as determined in accordance with paragraph (B)(4) of OAC rule 3745-17-03.
	OAC rule 3745-17-08(B), (B)(8), and (B)(9)	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See A.I.2.c through A.I.2.j below.
Unpaved roadways and parking areas (see Section A.I.2.b below)	OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period, as determined in accordance with paragraph (B)(4) of OAC rule 3745-17-03.
	OAC rule 3745-17-08(B), (B)(8), and (B)(9)	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See A.I.2.c through A.I.2.j below.

2. Additional Terms and Conditions

- a. The paved roadways and parking areas that are covered by this permit and subject to the requirements

of OAC rules 3745-17-07 and 3745-17-08 are listed below:

- (a) paved roadways:
- data center driveway
 - main plant loop
 - transportation road
 - coated products access roads
 - galvanize/silicon shipping area
 - rolling and finishing access roads
 - 56" mill access roads
 - machine shop/fabrication shop access roads
 - caster/SPA access roads
 - BOF/Heckett access roads
 - hot metal gate access road
 - blast furnace/boiler house access roads
- paved parking areas:
- data center parking area
 - store room and truck parking area
- b. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:
- unpaved roadways:
- coated products acid unloading area
 - pickler coil storage area
 - 56" mill shipping coil storage area
 - main oil house/gasoline-diesel fueling area
 - slab storage east of 56" mill slab entrance
 - slab storage west of 56" mill slab entrance
 - caster exit and slab storage area
 - BOF access roadways
 - fabrication shop access roadways
 - access roadways to outside contractor trailers and #2 pumphouse
 - blast furnace office, maintenance, storage areas, waste water treatment, and boilerhouse access roadways
 - blast furnace sinter road, ore road, flue dust pile road, and car dumper road
- unpaved parking areas:
- rolling and finishing parking area
- c. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with chemical stabilization at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- f. A maximum speed limit of 15 miles per hour on unpaved roads shall be posted and enforced on the property.
- g. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- h. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or

earth moving equipment or erosion by water or other means.

- i. pen-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- j. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and each parking area in accordance with the following frequencies:

paved roadways and parking areas minimum inspection frequency

All Weekly

unpaved roadways and parking areas minimum inspection frequency

All Daily

- 2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions on days when the plant is operating. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- 3. The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
- 4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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IV. Reporting Requirements

- 1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- 2. The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

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V. Testing Requirements

1. Compliance with the emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraph (B)(3)(d) of OAC rule 3745-17-03.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: F001 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: F002 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Blast furnace raw material storage piles, including iron ore, briquettes, flue dust, mix, sinter, coke, and blend.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions for any material handling operation shall not exceed twenty percent opacity as a three-minute average, as determined in accordance with paragraph (B)(3) of OAC rule 3745-17-03.
	OAC rule 3745-17-07(B)(6)	There shall be no visible particulate emissions from any material storage pile except for a period of time not to exceed thirteen minutes during any sixty-minute observation period, as determined in accordance with paragraph (B)(3) of OAC rule 3745-17-03.
	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See A.I.2.b through A.I.2.f below.

2. Additional Terms and Conditions

- a. The storage piles that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:
 - (a) Blast furnace raw material storage piles, including iron ore, briquettes, flue dust, mix, sinter, coke, and blend.
- b. The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee currently treats the load-in and load-out of materials at each storage pile with a water spray system applied at the stacker and uses a bucket reclaimers to the conveyor during load-out, if and as needed. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The above-mentioned control measures shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspections conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures are unnecessary.
- d. The permittee shall employ reasonably available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee currently waters the ore piles, arranges them to provide a wind barrier, and maintains as low a storage pile height as possible to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile on a daily basis.
2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile on a daily basis.
3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile on a daily basis.
4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
6. The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
7. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 7.d shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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V. Testing Requirements

1. Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.
2. Compliance with the visible emission limitation for the material handling operations identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part

60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: F002 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: F003 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Coal unloading, conveying, pulverizing, and transfer	OAC rule 3745-17-07(B)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a 3-minute average. The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See A.1.2.b through A.2.c below.
	OAC rule 3745-17-08(B)	

2. Additional Terms and Conditions

- a. The material handling operations that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are coal unloading, conveying, pulverizing, and transfer.
- b. The permittee shall employ reasonably available control measures for the above-identified material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measures to ensure compliance:
 - material handling operations control measures
 - coal conveying maintain the partial enclosure around conveying operations
 - coal loading maintain the partial enclosure around loading operations
 - coal transfer maintain the total enclosure around transfer operations
 - coal unloading maintain the total enclosure around unloading operations
 - coal pulverizing maintain the total enclosure around pulverizing operations

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform weekly checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from the egress points (i.e., partial and total enclosures) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all weeks during which any visible fugitive particulate emissions were observed from the egress points (i.e., partial and total enclosures) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the visible emission limitation for the material handling operations identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: F003 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: F005 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
BOF electrostatic precipitator dust handling	OAC rule 3745-17-07(B)(1)	None. See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	None. See A.I.2.b below.

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. The BOF electrostatic precipitator dust handling operation is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. The BOF electrostatic precipitator dust handling operation is not located within the areas identified in "Appendix A" of the rule.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: F005 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: F006 Issuance type: Title V Preliminary Proposed Permit

A. **State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Truck, rail car, and clamshell unloading, conveying, and transfer of blast furnace raw materials including: ore fines, briquettes, sinter, coke, and dolomite	OAC rule 3745-17-07(B)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See A.1.2.b through A.2.d below.

2. **Additional Terms and Conditions**

- a. The material handling operations that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are the truck, rail car, and clamshell unloading, conveying, and transfer of blast furnace raw materials including: ore fines, briquettes, sinter, coke, and dolomite.
- b. The permittee shall employ reasonably available control measures for the above-identified material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measures to ensure compliance:
 - material handling operations control measures
 - raw material conveying maintain the partial enclosure . around conveying operations
 - sinter loading/unloading employ wet suppression
 - pellet and coke transfer maintain the total enclosure . around belt conveyors for . pellet and coke transfer . operations
 - coke transfer maintain the total enclosure . around belt conveyor loading . and unloading for coke transfer . operations

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measures are unnecessary.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

material handling operation minimum inspection frequency

sinter loading/unloading weekly
2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in A.III.4.d shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
4. The permittee shall perform weekly checks, when the emissions unit is in operation, for any visible fugitive particulate emissions from the egress points (i.e., partial and total enclosures) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each week during which an inspection was not performed by the required frequency; and
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
3. The permittee shall submit semiannual written reports that (a) identify all weeks during which any visible fugitive particulate emissions were observed from the egress points (i.e., partial and total enclosures) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the visible emission limitation for the material handling operations identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: F006 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: F007 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
BOF raw material handling	OAC rule 3745-17-07(B)(1)	None. See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	None. See A.I.2.b below.

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. The BOF raw material handling operation is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. The BOF raw material handling operation is not located within the areas identified in "Appendix A" of the rule.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: F007 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under

state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

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III. Monitoring and/or Record Keeping Requirements

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: F008 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hot metal transfer from torpedo cars to ladles at BOF shop	OAC rule 3745-17-07(B)(1)	None. See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	None. See A.I.2.b below.
2. Additional Terms and Conditions		
a.	Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. The hot metal transfer from torpedo cars to ladles at BOF shop is not located within the areas identified in "Appendix A" of the rule.	
b.	Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. The hot metal transfer from torpedo cars to ladles at BOF shop is not located within the areas identified in "Appendix A" of the rule.	

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: F008 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Applicable Emissions Limitations/Control

Operations, Property, and/or Equipment Applicable Rules/Requirements Measures

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: F011 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 1 Boiler ash pneumatic conveying and two ash silos	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)	Visible particulate emissions shall not exceed twenty percent opacity as a 3-minute average. The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See A.I.2.b through A.I.2.d below.

2. **Additional Terms and Conditions**

a. The material handling operations that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are fly ash and bottom ash handling operations including pneumatic

conveying from the fly ash silo to trucks and bottom ash transfer to trucks for disposal.

- b. The permittee shall employ reasonably available control measures for the above-identified material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measures to ensure compliance:

material handling operations control measures

pneumatic conveying from the fly ash silo to trucks wet suppression

bottom ash transfer to trucks wet suppression

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- c. For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the inspections conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measures are unnecessary.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, for material handling operations that are not adequately enclosed, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:
- material handling operations minimum inspection frequency
- pneumatic conveying from the fly ash silo to trucks daily
- bottom ash transfer to trucks daily
2. The above-mentioned inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the Ohio EPA, Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
- a. the date and reason any required inspection was not performed;
- b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
- c. the dates the control measures were implemented; and
- d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in A.III.4.d shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
- a. each day during which an inspection was not performed by the required frequency; and
- b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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V. **Testing Requirements**

1. Compliance with the visible emissions limitation of the material handling operations identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: F011 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: F012 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hot metal desulfurization station in BOF Shop for desulfurizing agent injection into transfer ladles of hot metal, equipped with a baghouse for particulate control	OAC rule 3745-31-05(A)(3) PTI 02-14116	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-18-06(E). Visible fugitive particulate emissions from the hot metal desulfurization station shall not exceed twenty percent opacity as a three-minute average from any building openings. Particulate emissions from the baghouse serving the hot metal desulfurization station shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases, 0.0023 pound per ton of hot metal desulfurized, and 2.3 tons per year. See A.I.2.c below. Fugitive particulate emissions from the hot metal desulfurization station shall not exceed 32.2 tons per year. See A.I.2.d below. reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from this emissions unit (See A.I.2.e below.)
	OAC rule 3745-17-07(B)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the baghouse shall not exceed twenty percent opacity as a six-minute average.
	OAC rule 3745-18-06(E)	Sulfur dioxide emissions shall not exceed 905.3 lbs/hour.

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11), OAC rules 3745-17-07(B)(1) through (9) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. The hot metal desulfurization station is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. The hot metal desulfurization

station is not located within the areas identified in "Appendix A" of the rule.

- c. The particulate emission limitation of 2.3 tons per year includes PM10 emissions of 1.7 tons per year.
- d. The fugitive particulate emission limitation of 32.2 tons per year includes fugitive PM10 emissions of 6.1 tons per year.
- e. The permittee shall employ reasonably available control measures that include the use of fans, and ductwork to adequately enclose, contain, and capture the particulate emissions, and vent the captured emissions to the baghouse. The collection efficiency of such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- f. It is assumed that the potential to emit for sulfur dioxide is well below the allowable emission rate; therefore, it is not necessary to establish monitoring, record keeping, and reporting requirements to ensure ongoing compliance. The emission testing required for this emissions unit will confirm the accuracy of this assumption.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
4. The permittee shall maintain records of the quantity of hot metal desulfurized in this emissions unit, in tons per year.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emissions limitation in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

Visible particulate emissions from the baghouse shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Visible fugitive particulate emissions from the hot metal desulfurization station shall not exceed twenty percent opacity as a three-minute average from any building openings.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the modifications listed in paragraph (B)(3) (b) of OAC rule 3745-17-03.
 - c. Emission Limitation:

Particulate emissions from the baghouse serving the hot metal desulfurization station shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases and 0.0023 pound per ton of hot metal desulfurized.

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
 - d. Emission Limitation:

Particulate emissions from the baghouse serving the hot metal desulfurization station shall not exceed 2.3 tons per year.

Applicable Compliance Method:

The following equation shall be used to demonstrate compliance with the annual particulate emission limitation:

$$PE = 0.010 \text{ gr/dscf} \times 48,000 \text{ cf/min} \times 5 \text{ min/148 tons} \times 1 \text{ lb/7000 gr} \times 1 \text{ ton/2000 lbs} \times \text{amt. of hot metal desulfurized (in tons/yr)}$$

Where

E (TSP) = particulate emission rate (tons/yr);

0.01 gr/dscf = allowable particulate emission rate (grain/dry standard cubic feet);

48,000 acf/min = normal baghouse flow rate at a grain loading of 0.010 gr/dscf (cubic feet/minute);

5 min/148 tons = maximum desulfurization cycle time of 5 minutes per 148 tons of metal;

1 lb/7000 gr = one pound per 7000 grains;

1 ton/2000 lbs = one ton per 2000 pounds; and

amt. of hot metal desulfurized (in tons/yr) = the total amount of hot metal desulfurized annually, as record in Section A.III.3.

e. Emission Limitation:

Fugitive particulate emissions from the hot metal desulfurization process shall not exceed 32.2 tons per year.

Applicable Compliance Method:

The following equation shall be used to demonstrate compliance with the annual fugitive particulate emission limitation:

$$FPE = \text{amt. of hot metal desulfurized (in tons/yr)} \times 1.09 \text{ lbs/ton} \times 0.03 \times 1 \text{ ton/2000 lbs};$$

Where

FPE = fugitive particulate emission rate (tons/yr);

amt. of hot metal desulfurized (in tons/yr) = the total amount of hot metal desulfurized annually, as recorded in Section A.III.3;

1.09 lbs/ton = emission factor for uncontrolled hot metal desulfurization specified in AP-42, Section 12.5, Table 12.5-1, 1/95 (Fifth Edition);

0.03 = based upon 97% control efficiency of the baghouse for the hot metal desulfurization process (3% of particulate emissions from the hot metal desulfurization process are not captured by the baghouse); and

1 ton/2000 lbs = conversion of pounds to tons.

f. Emission Limitation:

Sulfur dioxide emissions shall not exceed 905.3 lbs/hour.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission rate in accordance with 40 CFR Part 60, Appendix A, Methods 6 or 6C and the procedures in OAC rule 3745-18-04.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months of the issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limits for particulate emissions from the baghouse and sulfur dioxide emissions.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates: Methods 1 through 5 (or modified Method 5 with prior approval of the Ohio EPA Northeast District Office) of 40 CFR Part 60, Appendix A.

d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for sulfur dioxide: Methods 6 or 6C of 40 CFR Part 60, Appendix A, and the procedures in OAC rule 3745-18-04.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: F012 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: F013 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Double strand continuous slab caster equipped with mechanical and argon shrouding of the steel stream from ladle to Tundish and mechanical shrouding of the steel stream from Tundish to mold	OAC rule 3745-31-05(A)(3) PTI 02-4470	Fugitive particulate emissions shall not exceed 1.82 pounds per hour from the double strand continuous slab caster.
	OAC rule 3745-17-07(B)(1)	None. See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	None. See A.I.2.b below.

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) through (9) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. The double strand continuous slab caster is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. The double strand continuous slab caster is not located within the areas identified in "Appendix A" of the rule.

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II. Operational Restrictions

1. The permittee shall utilize the mechanical shrouding from the Tundish to the mold when this emissions unit is in operation.
2. The permittee shall utilize the mechanical and argon shrouding from the ladle to the Tundish when this emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly inspections of the mechanical shrouding from the Tundish to the mold and the mechanical and argon shrouding from the ladle to the Tundish to ensure there are no cracks, gaps, and/or other operational problems with the shrouds that would impair their ability to contain the fugitive dust.
2. The permittee shall maintain records of the following information:
 - a. the date of each inspection where it was determined by the permittee that there were operational problems with the mechanical shroud(s) and/or argon shroud;
 - b. a description of the operational problems with the mechanical shroud(s) and/or argon shroud;
 - c. the date(s) that the operational problems with the mechanical shroud(s) and/or argon shroud were corrected; and
 - d. a description of the repairs to the mechanical shroud(s) and/or argon shroud which corrected the operational problems.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the double strand continuous slab caster was operated without the mechanical shroud(s) and/or argon

shrouding.

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V. **Testing Requirements**

1. Emission Limitation:

Fugitive particulate emissions shall not exceed 1.82 pounds per hour from the double strand continuous slab caster.

Applicable Compliance Method:

The following equation shall be used to demonstrate compliance with the fugitive particulate emission limitation:

$$E = EF \times PR \times 0.10$$

where

E = fugitive particulate emission rate (lbs/hr);

EF = emission factor of 0.07 lb of particulates/ton of product, from AP 42, Section 12.5 Iron and Steel Production, Table 12.5-1, dated 1/95, uncontrolled teeming of unleaded steel;

PR = production rate of 260 tons/hr, based upon the maximum production capacity of the double strand continuous slab caster; and

0.10 = The mechanical shrouding is assumed to provide 90% capture of fugitive emissions. Control efficiency is based on Ohio EPA's RACM document, Section 2.2.3 Steel Manufacture, Table 2.2.3-2, item 8 for control efficiency of fugitive particulate emissions from continuous casting with hooding.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: F013 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: F014 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Steel slab ripping torch #1 using natural gas	OAC rule 3745-31-05(A)(3) PTI 02-7043	Fugitive particulate emissions shall not exceed 0.5 pound per hour from steel slab ripping torch #1. If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #1 and to comply with the visible emissions limitation of this permit, a water table particulate emission suppression system or other appropriate control system shall be used. Visible particulate emissions from steel slab ripping torch #1 shall not exceed twenty percent opacity as a three-minute average from any building openings.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)(3)	See A.I.2.a below. See A.I.2.b below.

2. **Additional Terms and Conditions**

- a. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Steel slab ripping torch #1 is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source

which is located within the areas identified in "Appendix A" of the rule. Steel slab ripping torch #1 is not located within the areas identified in "Appendix A" of the rule.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly inspections of the operation of steel slab ripping torch #1 to determine whether the use of a water table particulate emission suppression system or other appropriate control system is necessary.
2. If use of a water table particulate emission suppression system or other appropriate control system is necessary, the permittee shall perform weekly inspections of whichever system is used in association with steel slab ripping torch #1 to ensure there are no operational problems with the system which would impair its ability to control the visible emissions of fugitive dust.
3. If use of the water table emission suppression system or other appropriate control system is necessary, the permittee shall maintain records of the following information:
 - a. the date of each inspection where it was determined by the permittee that there were operational problems with the water table particulate emission suppression system or other appropriate control system;
 - b. a description of the operational problems with the water table particulate emission suppression system or other appropriate control system;
 - c. the date(s) that the operational problems with the water table particulate emission suppression system or other appropriate control system were corrected; and
 - d. a description of the repairs to the water table particulate emission suppression system or other appropriate control system which corrected the operational problems.
4. The permittee shall perform weekly checks, when at least one or more of emissions units F014, F015, F021, and/or F022 is (are) in operation, for any visible fugitive particulate emissions from the egress points (i.e., building openings) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each week during which an inspection was not performed by the required frequency; and
 - b. each instance and the duration of each instance when use of the water table particulate emission suppression system or other appropriate control system was necessary but not implemented.
2. The permittee shall submit semiannual written reports that (a) identify all weeks during which any visible fugitive particulate emissions were observed from the egress points (i.e., building openings) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Emission Limitation:

Fugitive particulate emissions shall not exceed 0.5 pound per hour from steel slab ripping torch #1.

Applicable Compliance Method:

The following equation shall be used to demonstrate compliance with the fugitive particulate emission limitation:

$$E = EF \times PR \times 12 \text{ months/yr} \times 1 \text{ yr}/8760 \text{ hrs}$$

where

E = fugitive particulate emission rate (lbs/hr);

EF = emission factor of 0.0126 lb of particulate/ton derived from an emission factor of 0.1 lb/ton from AP 42, Section 12.5 Iron and Steel Production, Table 12.5-1, dated 1/95, uncontrolled machine scarfing, and taking into account the surface areas of typical slabs for scarfing (13.01 ft²/ton scarfed) and slitting (1.64 ft²/ton slit) [(1.64 ft²/13.01 ft²) x 0.1 lbs = 0.0126 lb/ton];

PR = production rate of 25,000 tons per month, based upon the maximum weight of slabs processed per month by steel slab ripping torch #1 (tons/month);

12 = 12 months operation per year; and

1/8760 = one year per 8760 hours.

2. Compliance with the visible emission limitation for steel slab ripping torch #1 identified in Section A.1.1 shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modification listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: F014 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: F015 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Steel slab ripping torch #2 using natural gas	OAC rule 3745-31-05(A)(3) PTI 02-7043	Fugitive particulate emissions shall not exceed 0.5 pound per hour from steel slab ripping torch #2. If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #2 and to comply with the visible emissions limitation of this permit, a water table particulate emission suppression system or other appropriate control system shall be used. Visible particulate emissions from steel slab ripping torch #2 shall not exceed twenty percent opacity as a three-minute average from any building openings. See A.I.2.a below. See A.I.2.b below.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)(3)	

2. **Additional Terms and Conditions**

- a. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Steel slab ripping torch #2 is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. Steel slab ripping torch #2 is not located within the areas identified in "Appendix A" of the rule.

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II. **Operational Restrictions**

- 1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly inspections of the operation of steel slab ripping torch #2 to determine whether the use of a water table particulate emission suppression system or other appropriate control system is necessary.
2. If use of a water table particulate emission suppression system or other appropriate control system is necessary, the permittee shall perform weekly inspections of whichever system is used in association with steel slab ripping torch #2 to ensure there are no operational problems with the system which would impair its ability to control the visible emissions of fugitive dust.
3. If use of the water table emission suppression system or other appropriate control system is necessary, the permittee shall maintain records of the following information:
 - a. the date of each inspection where it was determined by the permittee that there were operational problems with the water table particulate emission suppression system or other appropriate control system;
 - b. a description of the operational problems with the water table particulate emission suppression system or other appropriate control system;
 - c. the date(s) that the operational problems with the water table particulate emission suppression system or other appropriate control system were corrected; and
 - d. a description of the repairs to the water table particulate emission suppression system or other appropriate control system which corrected the operational problems.
4. The permittee shall perform weekly checks, when at least one or more of emissions units F014, F015, F021, and/or F022 is (are) in operation, for any visible fugitive particulate emissions from the egress points (i.e., building openings) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each week during which an inspection was not performed by the required frequency; and
 - b. each instance and the duration of each instance when use of the water table particulate emission suppression system or other appropriate control system was necessary but not implemented.
2. The permittee shall submit semiannual written reports that (a) identify all weeks during which any visible fugitive particulate emissions were observed from the egress points (i.e., building openings) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Emission Limitation:

Fugitive particulate emissions shall not exceed 0.5 pound per hour from steel slab ripping torch #2.

Applicable Compliance Method:

The following equation shall be used to demonstrate compliance with the fugitive particulate emission limitation:

$$E = EF \times PR \times 12 \text{ months/yr} \times 1 \text{ yr}/8760 \text{ hrs}$$

where

E = fugitive particulate emission rate (lbs/hr);

EF = emission factor of 0.0126 lb of particulate/ton derived from an emission factor of 0.1 lb/ton from AP 42, Section 12.5 Iron and Steel Production, Table 12.5-1, dated 1/95, uncontrolled machine scarfing, and taking into account the surface areas of typical slabs for scarfing (13.01 ft²/ton scarfing) and slitting (1.64 ft²/ton slit) [(1.64 ft²/13.01 ft²) x 0.1 lbs = 0.0126 lb/ton];

PR = production rate of 25,000 tons per month, based upon the maximum weight of slabs processed per month by steel slab ripping torch #2 (tons/month);

12 = 12 months operation per year; and

1/8760 = one year per 8760 hours.

2. Compliance with the visible emission limitation for steel slab ripping torch #2 identified in Section A.I.1 shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modification listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: F015 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: F020 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Old residual solid waste landfill material handling	OAC rule 3745-17-07(B)(1)	None. See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	None. See A.I.2.b below.

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. The old residual solid waste landfill material handling operations are not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. The old residual solid waste landfill material handling operations are not located within the areas identified in "Appendix A" of the rule.

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: F020 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: F021 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Steel slab ripping torch #5 using natural gas	OAC rule 3745-31-05(A)(3) PTI 02-3116	Fugitive particulate emissions shall not exceed 4.18 tons per year from steel slab ripping torch #5. If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #5 and to comply with the visible emissions limitation of this permit, a water table particulate emission suppression system or other appropriate control system shall be used. Visible particulate emissions from steel slab ripping torch #5 shall not exceed ten percent opacity as a six-minute average from any building openings. See A.I.2.a below. See A.I.2.b below.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)(3)	

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Steel slab ripping torch #5 is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. Steel slab ripping torch #5 is not located within the areas identified in "Appendix A" of the rule.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly inspections of the operation of steel slab ripping torch #5 to determine whether the use of a water table particulate emission suppression system or other appropriate control system is necessary.
2. If use of a water table particulate emission suppression system or other appropriate control system is necessary, the permittee shall perform weekly inspections of whichever system is used in association with steel slab ripping torch #5 to ensure there are no operational problems with the system which would impair its ability to control the visible emissions of fugitive dust.
3. If use of the water table emission suppression system or other appropriate control system is necessary, the permittee shall maintain records of the following information:
 - a. the date of each inspection where it was determined by the permittee that there were operational problems with the water table particulate emission suppression system or other appropriate control system;
 - b. a description of the operational problems with the water table particulate emission suppression system or other appropriate control system;
 - c. the date(s) that the operational problems with the water table particulate emission suppression system or other appropriate control system were corrected; and

- d. a description of the repairs to the water table particulate emission suppression system or other appropriate control system which corrected the operational problems.
4. The permittee shall perform weekly checks, when at least one or more of emissions units F014, F015, F021, and/or F022 is (are) in operation, for any visible fugitive particulate emissions from the egress points (i.e., building openings) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the color of the emissions;
 - the total duration of any visible emission incident; and
 - any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

- The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - each week during which an inspection was not performed by the required frequency; and
 - each instance and the duration of each instance when use of the water table particulate emission suppression system or other appropriate control system was necessary but not implemented.
- The permittee shall submit semiannual written reports that (a) identify all weeks during which any visible fugitive particulate emissions were observed from the egress points (i.e., building openings) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

- Emission Limitation:

Fugitive particulate emissions shall not exceed 4.18 tons per year from steel slab ripping torch #5.

Applicable Compliance Method:

The following equation shall be used to demonstrate compliance with the fugitive particulate emission limitation:

$$E = EF \times PR \times 12 \times 1/2000$$

where

E = fugitive particulate emission rate (tons/yr);

EF = emission factor of 0.0139 lb of particulate/ton derived from an emission factor of 0.1 lb/ton from AP 42, Section 12.5 Iron and Steel Production, Table 12.5-1, dated 1/95, uncontrolled machine scarfing, and taking into account the surface areas of typical slabs for scarfing (13.01 ft²/ton scarfed) and slitting (1.64 ft²/ton slit) [(1.64 ft²/13.01 ft²) x 0.1 lbs = 0.0126 lb/ton], and side trimming [(2.5 ft/25 ft slab) x 0.0126 lb/ton = 0.00126 lb/ton] to get the emission factor (0.0126 lb/ton + 0.00126 lb/ton = 0.0139 lb/ton) ;

PR = production rate of 50,000 tons per month, based upon the maximum weight of slabs processed per month by steel slab ripping torch #5 (tons/month);

12 = 12 months operation per year; and

1/2000 = one ton per 2000 pounds.
- Compliance with the visible emission limitation for steel slab ripping torch #5 identified in Section A.I.1 shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modification listed in paragraph (B)(3)(b) of OAC rule 3745-17-03.

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VI. Miscellaneous Requirements

- None

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Facility ID: 0278000463 Emissions Unit ID: F021 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: F022 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Steel slab ripping torch #6 using natural gas	OAC rule 3745-31-05(A)(3) PTI 02-3116	Fugitive particulate emissions shall not exceed 4.18 tons per year from steel slab ripping torch #6. If needed to minimize or eliminate visible fugitive particulate emissions resulting from slag splatter during operation of steel slab ripping torch #6 and to comply with the visible emissions limitation of this permit, a water table particulate emission suppression system or other appropriate control system shall be used. Visible particulate emissions from steel slab ripping torch #6 shall not exceed ten percent opacity as a six-minute average from any building openings.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)(3)	See A.I.2.a below. See A.I.2.b below.

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Steel slab ripping torch #6 is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. Steel slab ripping torch #6 is not located within the areas identified in "Appendix A" of the rule.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform weekly inspections of the operation of steel slab ripping torch #6 to determine whether the use of a water table particulate emission suppression system or other appropriate control system is necessary.
2. If use of a water table particulate emission suppression system or other appropriate control system is necessary, the permittee shall perform weekly inspections of whichever system is used in association with steel slab ripping torch #6 to ensure there are no operational problems with the system which would impair its ability to control the visible emissions of fugitive dust.
3. If use of the water table emission suppression system or other appropriate control system is necessary, the permittee shall maintain records of the following information:
 - a. the date of each inspection where it was determined by the permittee that there were operational problems with the water table particulate emission suppression system or other appropriate control system;
 - b. a description of the operational problems with the water table particulate emission suppression system or other appropriate control system;
 - c. the date(s) that the operational problems with the water table particulate emission suppression system or other appropriate control system were corrected; and
 - d. a description of the repairs to the water table particulate emission suppression system or other appropriate control system which corrected the operational problems.
4. The permittee shall perform weekly checks, when at least one or more of emissions units F014, F015, F021, and/or F022 is (are) in operation, for any visible fugitive particulate emissions from the egress points (i.e., building openings) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;

- b. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each week during which an inspection was not performed by the required frequency; and
 - b. each instance and the duration of each instance when use of the water table particulate emission suppression system or other appropriate control system was necessary but not implemented.
2. The permittee shall submit semiannual written reports that (a) identify all weeks during which any visible fugitive particulate emissions were observed from the egress points (i.e., building openings) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Emission Limitation:

Fugitive particulate emissions shall not exceed 4.18 tons per year from steel slab ripping torch #6.

Applicable Compliance Method:

The following equation shall be used to demonstrate compliance with the fugitive particulate emission limitation:

$$E = EF \times PR \times 12 \times 1/2000$$

where

E = fugitive particulate emission rate (tons/yr);

EF = emission factor of 0.0139 lb of particulate/ton derived from an emission factor of 0.1 lb/ton from AP 42, Section 12.5 Iron and Steel Production, Table 12.5-1, dated 1/95, uncontrolled machine scarfing, and taking into account the surface areas of typical slabs for scarfing (13.01 ft²/ton scarfed) and slitting (1.64 ft²/ton slit) [(1.64 ft²/13.01 ft²) x 0.1 lbs = 0.0126 lb/ton], and side trimming [(2.5 ft/25 ft slab) x 0.0126 lb/ton = 0.00126 lb/ton] to get the emission factor (0.0126 lb/ton + 0.00126 lb/ton = 0.0139 lb/ton) ;

PR = production rate of 50,000 tons per month, based upon the maximum weight of slabs processed per month by steel slab ripping torch #6 (tons/month);

12 = 12 months operation per year; and

1/2000 = one ton per 2000 pounds.
2. Compliance with the visible emission limitation for steel slab ripping torch #6 identified in Section A.I.1 shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modification listed in paragraph (B)(3)(b) of OAC rule 3745-17-03.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: F022 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

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Facility ID: 0278000463 Emissions Unit ID: G001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	--------------------------------------	--

- | | | |
|---|------------------------|---|
| Gasoline storage tank: one 4,000-gallon aboveground storage tank | OAC rule 3745-21-09(R) | Measures
None. See A.2.a below. |
| Gasoline storage tanks: two 150-gallon aboveground storage tanks | | |
| Diesel storage tanks: one 12,000-gallon aboveground storage tank and one 10,000-gallon aboveground storage tank | | |
| Kerosene storage tank: one 8,000-gallon aboveground storage tank | | |
2. **Additional Terms and Conditions**
- a. Any gasoline dispensing facility which has an annual throughput of less than one hundred twenty thousand (120,000) gallons of gasoline is not subject to the requirements of paragraphs (R)(1) to (R)(3) of OAC rule 3745-21-09(R).

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the quantity of gasoline delivered to the facility during each calendar month. The records shall be maintained at the facility for a period of three years.

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IV. **Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Northeast District Office, if the annual gasoline throughput for any rolling twelve-month period is equal to or greater than one hundred twenty thousand (120,000) gallons. The Ohio EPA, Northeast District Office, shall be notified within forty-five (45) days after the exceedance occurs.

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: G001 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the

applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Continuous silicon steel core plating line including roll coater and curing oven (catenary furnace), equipped with two exhaust afterburners	OAC rule 3745-31-05(A)(3) PTI 02-190	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-21-09(E).
	OAC rule 3745-21-09(E)	No owner or operator of a coil coating line may cause,

allow, or permit the discharge into the ambient air of any volatile organic compounds (VOCs) in excess of 2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents, or, if a control system is employed, 4.0 pounds of VOC per gallon of solids from a prime coat, topcoat, or single coat coating line.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. The temperature of the final exhaust gases from the catenary furnace shall not drop below 1240 degrees Fahrenheit, as an average for each 3-hour period, when the emissions unit is in operation employing a coating with a VOC content in excess of 2.6 lbs/gallon.
2. If necessary, the permittee shall operate the afterburners for the catenary furnace to ensure that the temperature of the exhaust gases from the catenary furnace do not drop below 1240 degrees Fahrenheit, as an average, for any three-hour period when the emissions unit is in operation employing a coating with a VOC content in excess of 2.6 lbs/gallon.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each day for all 3-hour periods when the coating line was in operation and the temperature of the exhaust gases from the catenary furnace was greater than 1240 degrees Fahrenheit:
 - a. the name and identification number of each coating used;
 - b. the mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
 - c. the maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of all the coatings; and
 - d. the calculated, controlled VOC emissions rate, in mass of VOC per unit volume of coating solids, as applied [the controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the source was in compliance].
2. The permittee shall collect and record the following information each day for all 3-hour periods when the coating line was in operation and the temperature of the exhaust gases from the catenary furnace was less than 1240 degrees Fahrenheit:
 - a. the name and identification number of each coating used; and
 - b. the VOC content, in pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.
3. The permittee shall continuously monitor and record the temperature of the exhaust gases from the catenary furnace when the coating line is in operation. The permittee shall maintain a record of the temperature of the exhaust gases from the catenary furnace for each 3-hour period of operation of the coating line.
4. The permittee shall maintain a log or record of the operating time for the capture (collection) system, control device, monitoring equipment, and the associated coating line when it is in operation.

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IV. **Reporting Requirements**

1. The permittee shall notify the Ohio EPA Northeast District Office of any daily record showing that the calculated, controlled VOC emission rate exceeded 4.0 pounds of VOC per gallon of solids during periods when the average temperature of the exhaust gases from the catenary furnace was greater than 1240 degrees Fahrenheit. A copy of such record shall be sent to the Ohio EPA Northeast District Office within forty-five days after the exceedance occurs.
2. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the catenary furnace, when the emissions unit was in operation, was less than 1240 degrees Fahrenheit and the VOC contents of any of the coatings employed exceeded 2.6 pounds VOC per gallon of coating, excluding water and exempt solvents. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and

shall cover the previous calendar quarters. The reports shall also indicate the date(s) and time(s) that the afterburners on the catenary furnace were employed.

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V. **Testing Requirements**

1. Compliance with the emission limitation in Section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

No owner or operator of a coil coating line may cause, allow, or permit the discharge into the ambient air of any volatile organic compounds (VOCs) in excess of 2.6 pounds of VOC per gallon of coating, excluding water and exempt solvents, or, if a control system is employed, 4.0 pounds of VOC per gallon of solids from a prime coat, topcoat, or single coat coating line.

Applicable Compliance Method:

i. Compliance shall be demonstrated based upon the record keeping requirements specified in Section A.III of these terms and conditions.

ii. US EPA Method 24 shall be used to determine the VOC contents of all the coatings employed in this emissions unit.

iii. Compliance with the 4.0 pounds of VOC per gallon of solids limitation also shall be demonstrated through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, 25A, and 204.

2. The permittee shall conduct emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after initial permit issuance and within 6 months prior to permit expiration.

b. The following test methods shall be employed to determine the capture and control efficiency of the catenary furnace: 40 CFR Part 60, Appendix A, Methods 1 through 4, and 25 or 25A, as appropriate and 40 CFR Part 51, Appendix M, Method 204.

c. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) or the outlet concentration shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: L025 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Solvent metal cold cleaner No. 650-77870 using Safety-Kleen 105 parts washing solvent or a comparable solvent	OAC rule 3745-21-09(O)(2)	See A.II.1 below.
	OAC rule 3745-31-05(A)(3) PTI 02-18062	Emissions of volatile organic compounds (VOC) shall not exceed 1.21 pounds per hour. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O).

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. The permittee shall equip the cold cleaner with either:
 - a. a cover; and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute measured at one hundred degrees Fahrenheit, or the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand; or
 - b. a remote solvent reservoir from which solvent is pumped through a nozzle suspended over a sink-like work area which drains back to the reservoir, provided the sink-like work area has an open drain area of less than sixteen square inches and provided the solvent neither is heated above one hundred degrees Fahrenheit nor has a vapor pressure greater than 0.6 pound per square inch absolute, measured at one hundred degrees Fahrenheit.
2. The permittee shall equip the cold cleaner with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at one hundred degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining unless an internal type drainage device cannot fit into the cleaning system.
3. The permittee shall install one of the following devices if the solvent vapor pressure is greater than 0.6 pound per square inch absolute measured at one hundred degrees Fahrenheit, or if the solvent is heated above one hundred twenty degrees Fahrenheit:
 - a. freeboard that gives a freeboard ratio greater than or equal to 0.7;
 - b. water cover (solvent must be insoluble in and heavier than water); or
 - c. other systems of equivalent control, such as refrigerated chiller or carbon adsorption, approved by the Ohio EPA Northeast District Office.
4. The permittee shall operate and maintain the cold cleaner in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. provide a permanent, legible, conspicuous label, summarizing the operating requirements;
 - b. store waste solvent in covered containers;
 - c. close the cover whenever parts are not being handled in the cleaner;
 - d. drain the cleaned parts until dripping ceases;
 - e. if used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed ten pounds per square inch gauge; and
 - f. clean only materials that are neither porous nor absorbent.
5. The permittee shall not employ any of the halogenated solvents identified in 40 CFR Part 63, Subpart T, in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. Any owner or operator of a solvent metal cleaning operation shall maintain records of the following information in a readily accessible location for at least five years and shall make these records available to the Director upon verbal or written request:

- a. all control equipment maintenance such as replacement of the carbon in a carbon adsorption unit;
 - b. for cold cleaners, the types of solvents employed and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit; and
 - c. the results of all emissions tests conducted, if required, to demonstrate compliance with the terms and conditions of this permit.
2. The permittee shall collect and record the following information for each month for this emissions unit:
- a. the company identification of each solvent employed;
 - b. an indication of whether or not each solvent employed is a hazardous air pollutant;
 - c. the density of each solvent employed (in pounds per gallon);
 - d. the liquid volume of cleaning solvent employed (in gallons);
 - e. liquid volume of cleaning solvent sent off-site as waste (in gallons);
 - f. the number of hours of operation;
 - g. the total VOC emissions (the summation of [(d - e) x c] for all solvents employed), in pounds;
 - h. the average hourly VOC emissions (g/f), in pounds/hour; and
 - i. the total annual VOC emissions (the summation of (h) on an annual basis).

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IV. Reporting Requirements

- 1. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.
- 2. The permittee shall submit deviation (excursion) reports that identify each day when a solvent that is a hazardous air pollutant was employed in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- 3. The permittee shall notify the Ohio EPA Northeast District Office of any monthly record showing that the calculated VOC emission rate exceeds 1.21 pounds of VOC per hour. A copy of such record shall be sent to the Ohio EPA Northeast District Office within forty-five days after the exceedance occurs.

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V. Testing Requirements

- 1. Compliance with the emissions limitation of 1.21 lbs/hour in Section A.I of these terms and conditions shall be determined in accordance with record keeping in Section A.III.2 of these terms and conditions.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: L025 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the

applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
750 mmBtu/hr, 56" mill rehear furnace, direct fired with natural gas, coke oven gas, or a mixture of natural gas and coke oven gas	OAC rule 3745-17-11	None. See A.I.2.a below.
	OAC rule 3745-17-07(A)	None. See A.I.2.b below.
	OAC rule 3745-18-84(I)	Sulfur dioxide emissions shall not exceed 1.7

lbs/mmBtu actual heat input.

2. Additional Terms and Conditions

- a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate matter emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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1. The permittee shall burn in this emissions unit only natural gas, desulfurized coke oven gas with a concentration of H₂S less than 35 grains per 100 dry standard cubic feet (as an average for each rolling, 3-hour period), or a mixture of natural gas and desulfurized coke oven gas with a concentration of H₂S less than 35 grains per 100 dry standard cubic feet (as an average for each rolling, 3-hour period).
2. The permittee shall not burn undesulfurized coke oven gas in this emissions unit.
3. This emissions unit can be fired with desulfurized coke oven gas produced by the ISG Warren facility, facility ID 02-78-00-0648. In accordance with 40 CFR 52.21 (Approval to Construct, Prevention of Significant Deterioration of Air Quality, September 27, 1977) and a Consent Order (Case No. C78-1659), the following coke oven gas quality specification applies to coke oven gas produced by coke battery number 4 at the ISG Warren facility, facility ID 02-78-00-0648, emissions unit B901:

No coke oven gas from coke battery number 4 at the ISG Warren facility, facility ID 02-78-00-0648, shall be burned unless it contains a concentration of sulfur compounds, expressed as H₂S, of less than 35 grains per 100 dry standard cubic feet (dscf) of coke oven gas produced. The limit of 35 grains per 100 dscf includes the sulfur concentration in the desulfurized coke oven gas and the sulfur concentration in the desulfurization tail gas, combined, measured by continuous emissions monitoring at the desulfurization plant at the ISG Warren facility.

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, desulfurized coke oven gas with a concentration of H₂S less than 35 grains per 100 dry standard cubic feet, or a mixture of natural gas and desulfurized coke oven gas with a concentration of H₂S less than 35 grains per 100 dry standard cubic feet, the permittee shall maintain a record of the type, quantity, and quality of fuel burned in this emissions unit.
2. The permittee shall continuously monitor and record the sulfur content of the desulfurized coke oven gas burned in this emissions unit to ensure that the concentration of sulfur compounds is less than 35 grains per 100 dry standard cubic feet (as an average for each rolling, 3-hour period). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous sulfur dioxide and total reduced sulfur monitoring systems including, but not limited to, the grains of hydrogen sulfide per 100 dry standard cubic feet (dscf) for the desulfurized coke oven gas on a daily average basis, based upon the average emission rate for the actual hours of operation for this emissions unit during each calendar day.

In lieu of the above requirement, the permittee may accept the coke oven gas supplier's monitoring and record keeping for sulfur content in the desulfurized coke oven gas if said monitoring and record keeping meets the requirements of 40 CFR Part 60.13.

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1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or desulfurized coke oven gas was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each rolling, 3-hour period during which the concentration of H₂S in the desulfurized coke oven gas burned in this emissions unit exceeded 35 grains per 100 dscf, and the actual H₂S content for each such 3-hour period.

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1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Sulfur dioxide emissions shall not exceed 1.7 lbs/mmBtu actual heat input.

Applicable Compliance Method:

- (i) To determine the actual emission rate for SO2 from natural gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (0.6 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu}) = 0.0006 \text{ lb/mmBtu}$$

Where:

E = SO2 emission rate from natural gas, in lb/mmBtu;

0.6 lb/10⁶ scf = emission factor for SO2 from burning natural gas from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.
- (ii) To determine the actual emission rate for SO2 from coke oven gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (\text{H2S content}) \times (1 \text{ lb}/7000 \text{ grains}) \times (1 \text{ scf}/580 \text{ Btu}) \times (64 \text{ SO}_2/34 \text{ H}_2\text{S}) \times (1,000,000 \text{ Btu/mmBtu})$$

Where:

E = SO2 emission rate from coke oven gas, in lb/mmBtu;

H2S content = grains of H2S in 100 scf of desulfurized coke oven gas recorded in Section A.III.4;

1 lb/7000 grains = conversion from pounds to grains;

1 scf/580 Btu = the heat value of 1 scf of coke oven gas;

64 SO2/34 H2S = the ratio of grams per mole of SO2 to mole of H2S; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.
- (iii) If required, the permittee shall demonstrate compliance with this emission rate in accordance with 40 CFR Part 60, Appendix A, Methods 6 or 6C and the procedures in OAC rule 3745-18-04.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: P001 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P002 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Number 5 continuous steel pickling line using HCl, equipped with a wet scrubber	OAC rule 3745-17-11(B)(1)	Particulate emissions from the wet scrubber outlet from steel pickling line number 5 shall not exceed 50.2 pounds per hour. See A.I.2.e below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average.
	40 CFR Part 63, Subpart CCC	HCl emissions from the wet scrubber outlet from steel pickling line number 5 shall not exceed 18 parts per million by volume (ppmv). See A.I.2.a through A.I.2.d, A.II.3, and A.III.2 below.

2. Additional Terms and Conditions

- a. The permittee shall achieve initial compliance with the requirements of 40 CFR Part 63, Subpart CCC,

no later than June 22, 2001.

- b. If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Ohio EPA Northeast District Office may be used.
- c. The permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of 40 CFR Part 63, Subpart CCC.
- d. The permittee shall maintain a record of each inspection, including each item identified in Section A.III.2.c.iv, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.
- e. The particulate emissions limitation of 50.2 pounds per hour is based upon a process weight rate of 90 tons per hour and Table I of OAC rule 3745-17-11. If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II of OAC rule 3745-17-11 is more stringent than 50.2 lbs/hour, the permittee shall comply with the more stringent limitation.

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II. Operational Restrictions

1. The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 5 inches of water at all times while the emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 9.75 gallons per minute at all times while the emissions unit is in operation.
3. As required by section 63.6(e)(3) of 40 CFR Part 63, Subpart A, the permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the emissions unit during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the 40 CFR Part 63, Subpart CCC.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the wet scrubber while the emissions unit is in operation. The monitoring device and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall properly operate and maintain equipment to continuously monitor the water flow rate across the wet scrubber while the emissions unit is in operation. The monitoring device used to monitor the water flow rate across the wet scrubber shall be certified to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year. The monitoring device and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information each shift while the wet scrubber is operating:

 - a. the pressure drop across the wet scrubber, in inches of water;
 - b. the wet scrubber water flow rate, in gallons per minute; and
 - c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date of June 22, 2001. The plan must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:
 - i. require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
 - ii. require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
 - iii. require cleaning of the scrubber internals at intervals sufficient to prevent buildup of solids or other fouling; and
 - iv. require an inspection of the scrubber at intervals of no less than 3 months with:
 - (a) cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;

- (b) repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
 - (c) repair or replacement of droplet eliminator elements as needed;
 - (d) repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
 - (e) adjustment of damper settings for consistency with the required air flow.
3. The permittee shall maintain records for 5 years from the date of each record of:
- a. the occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - b. the occurrence and duration of each malfunction of the air pollution control equipment;
 - c. all maintenance performed on the air pollution control equipment;
 - d. actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
 - e. all information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan;
 - f. all required measurements needed to demonstrate compliance with 40 CFR Part 63, Subpart CCC, and to support the data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;
 - g. all results of initial or subsequent performance tests;
 - h. all documentation supporting initial notifications and notifications of compliance status; and
 - i. records of any applicability determination, including supporting analyses.
4. In addition to the general records required in Section A.III.3 of these terms and conditions, the permittee shall maintain records for 5 years from the date of each record of:
- a. scrubber makeup water flow rate and recirculation water flow rate;
 - b. calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and
 - c. each maintenance inspection and repair, replacement, or other corrective action.
5. The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Ohio EPA Northeast District Office for the life of the emissions unit or until the emissions unit is no longer subject to the provisions of 40 CFR Part 63, Subpart CCC. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Ohio EPA Northeast District Office for a period of 5 years after each revision to the plan.
6. All records required by Sections A.III.3 and A.III.4 of these terms and conditions for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following wet scrubber parameters were not maintained at or above the required levels:
 - a. the static pressure drop across the wet scrubber; and
 - b. the wet scrubber water flow rate.
2. As required by section 63.10(d)(5)(i) of 40 CFR Part 63, Subpart A, the permittee shall submit the following reports:
 - a. If actions taken by the permittee during a startup, shutdown, or malfunction of the emissions unit (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup,

shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.

b. Any time an action taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of section 63.10(d)(5)(ii) of 40 CFR Part 63, Subpart A.

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V. **Testing Requirements**

1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Particulate emissions from the wet scrubber outlet from steel pickling line number 5 shall not exceed 50.2 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5 or 26A and the procedures specified in OAC rule 3745-17-03(B)(10).
 - c. Emission Limitation:

HCl emissions from the wet scrubber outlet from steel pickling line number 5 shall not exceed 18 parts per million by volume (ppmv).

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted every 2.5 years in accordance with 40 CFR Part 63, Subpart CCC.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for HCl.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and 26A of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months of the effective date of this permit.
 - b. The emission testing shall be conducted at the outlet of the scrubber to demonstrate compliance with the allowable mass emission limitation for particulates.

c. A particulate emissions test also shall be conducted at the inlet of the scrubber to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11.

d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and 5 and/or 26A of 40 CFR Part 60, Appendix A.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: P002 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: P003 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Number 6 continuous steel pickling line using HCl, equipped with a wet scrubber	OAC rule 3745-17-11(B)(1)	Particulate emissions from the wet scrubber outlet from steel pickling line number 6 shall not exceed 50.2 pounds per hour. See A.I.2.e below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average.
	40 CFR Part 63, Subpart CCC	HCl emissions from the wet scrubber outlet from steel pickling line number 6 shall not exceed 18 parts per million by volume (ppmv). See A.I.2.a through A.I.2.d, A.II.3, and A.III.2 below.

2. Additional Terms and Conditions

- a. The permittee shall achieve initial compliance with the requirements of 40 CFR Part 63, Subpart CCC, no later than June 22, 2001.
- b. If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Ohio EPA Northeast District Office may be used.
- c. The permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of 40 CFR Part 63, Subpart CCC.
- d. The permittee shall maintain a record of each inspection, including each item identified in Section A.III.2.c.iv, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

- e. The particulate emissions limitation of 50.2 pounds per hour is based upon a process weight rate of 90 tons per hour and Table I of OAC rule 3745-17-11. If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II of OAC rule 3745-17-11 is more stringent than 50.2 lbs/hour, the permittee shall comply with the more stringent limitation.

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II. Operational Restrictions

1. The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 7 inches of water at all times while the emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 8 gallons per minute at all times while the emissions unit is in operation.
3. As required by section 63.6(e)(3) of 40 CFR Part 63, Subpart A, the permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the emissions unit during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the 40 CFR Part 63, Subpart CCC.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the wet scrubber while the emissions unit is in operation. The monitoring device and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall properly operate and maintain equipment to continuously monitor the water flow rate across the wet scrubber while the emissions unit is in operation. The monitoring device used to monitor the water flow rate across the wet scrubber shall be certified to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year. The monitoring device and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information each shift while the wet scrubber is operating:

- a. the pressure drop across the wet scrubber, in inches of water;
 - b. the wet scrubber water flow rate, in gallons per minute; and
 - c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date of June 22, 2001. The plan must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:
 - i. require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
 - ii. require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
 - iii. require cleaning of the scrubber internals at intervals sufficient to prevent buildup of solids or other fouling; and
 - iv. require an inspection of the scrubber at intervals of no less than 3 months with:
 - (a) cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
 - (b) repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
 - (c) repair or replacement of droplet eliminator elements as needed;
 - (d) repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
 - (e) adjustment of damper settings for consistency with the required air flow.
 3. The permittee shall maintain records for 5 years from the date of each record of:
 - a. the occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - b. the occurrence and duration of each malfunction of the air pollution control equipment;

- c. all maintenance performed on the air pollution control equipment;
 - d. actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
 - e. all information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan;
 - f. all required measurements needed to demonstrate compliance with 40 CFR Part 63, Subpart CCC, and to support the data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;
 - g. all results of initial or subsequent performance tests;
 - h. all documentation supporting initial notifications and notifications of compliance status; and
 - i. records of any applicability determination, including supporting analyses.
4. In addition to the general records required in Section A.III.3 of these terms and conditions, the permittee shall maintain records for 5 years from the date of each record of:
- a. scrubber makeup water flow rate and recirculation water flow rate;
 - b. calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and
 - c. each maintenance inspection and repair, replacement, or other corrective action.
5. The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Ohio EPA Northeast District Office for the life of the emissions unit or until the emissions unit is no longer subject to the provisions of 40 CFR Part 63, Subpart CCC. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Ohio EPA Northeast District Office for a period of 5 years after each revision to the plan.
6. All records required by sections A.III.3 and A.III.4 of these terms and conditions for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

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IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following wet scrubber parameters were not maintained at or above the required levels:
 - a. the static pressure drop across the wet scrubber; and
 - b. the wet scrubber water flow rate.
- 2. As required by section 63.10(d)(5)(i) of 40 CFR Part 63, Subpart A, the permittee shall submit the following reports:
 - a. If actions taken by the permittee during a startup, shutdown, or malfunction of the emissions unit (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.
 - b. Any time an action taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of section 63.10(d)(5)(ii) of 40 CFR Part 63, Subpart A.

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V. Testing Requirements

- 1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:
- Particulate emissions from the wet scrubber outlet from steel pickling line number 6 shall not exceed 50.2 pounds per hour.
- Applicable Compliance Method:
- Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5 or 26A and the procedures specified in OAC rule 3745-17-03(B)(10).
- c. Emission Limitation:
- HCl emissions from the wet scrubber outlet from steel pickling line number 6 shall not exceed 18 parts per million by volume (ppmv).
- Applicable Compliance Method:
- Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted every 2.5 years in accordance with 40 CFR Part 63, Subpart CCC.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for HCl.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and 26A of 40 CFR Part 60, Appendix A.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months of the effective date of this permit.
- b. The emission testing shall be conducted at the outlet of the scrubber to demonstrate compliance with the allowable mass emission limitation for particulates.
- c. A particulate emissions test also shall be conducted at the inlet of the scrubber to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11.
- d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and 5 and/or 26A of 40 CFR Part 60, Appendix A.
- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P003 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: P005 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
54" tandem mill no. 42 for reduction of steel strip using soluble oil	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity as a six-minute average.
	OAC rule 3745-17-07(B)(1)	Visible fugitive particulate emissions from this emissions unit shall not exceed twenty percent opacity as a three-minute average from any building openings.
	OAC rule 3745-17-11(B)(1)	Particulate emissions from the stack associated with this emissions unit shall not exceed 50.6 pounds per hour. See A.I.2.b below.
	OAC rule 3745-17-08(B)(3)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from this emissions unit (See A.I.2.a below.)

2. Additional Terms and Conditions

- a. The permittee shall employ reasonably available control measures that include the use of fans, and ductwork to adequately enclose, contain, and capture the particulate emissions, and vent the captured emissions to the settling chamber. The collection efficiency of such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- b. The particulate emissions limitation of 50.6 pounds per hour is based upon a process weight rate of 93.6 tons per hour and Table I of OAC rule 3745-17-11. If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II of OAC rule 3745-17-11 is more stringent than 50.6 lbs/hour, the permittee shall comply with the more stringent limitation.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;

- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operated under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operated under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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IV. Reporting Requirements

- 1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

- 1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Visible fugitive particulate emissions from this emissions unit shall not exceed twenty percent opacity as a three-minute average from any building openings.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- c. Emission Limitation:
- Particulate emissions from the stack associated with this emissions unit shall not exceed 50.6 pounds per hour.
- Applicable Compliance Method:
- Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03 (B)(10).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months of the effective date of this permit.
 - b. The emission testing shall be conducted at the outlet of the settling chamber to demonstrate compliance with the allowable mass emission limitation for particulates.
 - c. A particulate emissions test also shall be conducted at the inlet of the settling chamber to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11.
 - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
3. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

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VI. **Miscellaneous Requirements**

1. None

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B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or

control measures (if any) may be specified in narrative form following the table.

2. Additional Terms and Conditions

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P011 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
295 mmBtu/hr natural gas fired continuous silicon steel processing line annealing furnace	OAC rule 3745-31-05(A)(3) PTI 02-190	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-10(B)(1) and 3745-17-07(A).
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as

provided by the rule.
See Section A.I.2.a below.

OAC rule 3745-18-06(A)

2. **Additional Terms and Conditions**

- a. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

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II. **Operational Restrictions**

1. The permittee shall only employ natural gas to heat the continuous silicon steel processing line annealing furnace.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

To determine the actual emission rate for particulate matter from natural gas, the following equation may be used:

$$(1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1000 \text{ Btu}) \times (1,000,000 \text{ Btu}/\text{mmBtu}) = 0.0019 \text{ lb}/\text{mmBtu}$$

Where:

E = particulate emission rate from burning natural gas, in lb/mmBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate material from burning natural gas from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1000 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P011 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P016 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
750 mmBtu/hr, 56" mill reheat furnace, direct fired with natural gas, coke oven gas, or a mixture of natural gas and coke oven gas	OAC rule 3745-17-11	None. See A.I.2.a below.
	OAC rule 3745-17-07(A)	None. See A.I.2.b below.
	OAC rule 3745-18-84(I)	Sulfur dioxide emissions shall not exceed 1.7 lbs/mmBtu actual heat input.

2. Additional Terms and Conditions

- a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate matter emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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II. Operational Restrictions

1. The permittee shall burn in this emissions unit only natural gas, desulfurized coke oven gas with a concentration of H₂S less than 35 grains per 100 dry standard cubic feet (as an average for each rolling, 3-hour period), or a mixture of natural gas and desulfurized coke oven gas with a concentration of H₂S less than 35 grains per 100 dry standard cubic feet (as an average for each rolling, 3-hour period).
2. The permittee shall not burn undesulfurized coke oven gas in this emissions unit.
3. This emissions unit can be fired with desulfurized coke oven gas produced by the ISG Warren facility, facility ID 02-78-00-0648. In accordance with 40 CFR 52.21 (Approval to Construct, Prevention of Significant Deterioration of Air Quality, September 27, 1977) and a Consent Order (Case No. C78-1659), the following coke oven gas quality specification applies to coke oven gas produced by coke battery number 4 at the ISG Warren facility, facility ID 02-78-00-0648, emissions unit B901:

No coke oven gas from coke battery number 4 at the ISG Warren facility, facility ID 02-78-00-0648, shall be burned unless it contains a concentration of sulfur compounds, expressed as H₂S, of less than 35 grains per 100 dry standard cubic feet (dscf) of coke oven gas produced. The limit of 35 grains per 100 dscf includes the sulfur concentration in the desulfurized coke oven gas and the sulfur concentration in the desulfurization tail gas, combined, measured by continuous emissions monitoring at the desulfurization plant at the ISG Warren facility.

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III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, desulfurized coke oven gas with a concentration of H₂S less than 35 grains per 100 dry standard cubic feet, or a mixture of natural gas and desulfurized coke oven gas with a concentration of H₂S less than 35 grains per 100 dry standard cubic feet, the permittee shall maintain a record of the type, quantity, and quality of fuel burned in this emissions unit.
2. The permittee shall continuously monitor and record the sulfur content of the desulfurized coke oven gas burned in this emissions unit to ensure that the concentration of sulfur compounds is less than 35 grains per 100 dry standard cubic feet (as an average for each rolling, 3-hour period). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous sulfur dioxide and total reduced sulfur monitoring systems including, but not limited to, the grains of hydrogen sulfide per 100 dry standard

cubic feet (dscf) for the desulfurized coke oven gas on a daily average basis, based upon the average emission rate for the actual hours of operation for this emissions unit during each calendar day.

In lieu of the above requirement, the permittee may accept the coke oven gas supplier's monitoring and record keeping for sulfur content in the desulfurized coke oven gas if said monitoring and record keeping meets the requirements of 40 CFR Part 60.13.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or desulfurized coke oven gas was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each rolling, 3-hour period during which the concentration of H₂S in the desulfurized coke oven gas burned in this emissions unit exceeded 35 grains per 100 dscf, and the actual H₂S content for each such 3-hour period.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Sulfur dioxide emissions shall not exceed 1.7 lbs/mmBtu actual heat input.

Applicable Compliance Method:

- (i) To determine the actual emission rate for SO₂ from natural gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (0.6 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu})$$

Where:

E = SO₂ emission rate from natural gas, in lb/mmBtu;

0.6 lb/10⁶ scf = emission factor for SO₂ from burning natural gas from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

- (ii) To determine the actual emission rate for SO₂ from coke oven gas, the following equation may be used:

To determine the actual emission rate for SO₂ from coke oven gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (\text{H}_2\text{S content}) \times (1 \text{ lb}/7000 \text{ grains}) \times (1 \text{ scf}/580 \text{ Btu}) \times (64 \text{ SO}_2/34 \text{ H}_2\text{S}) \times (1,000,000 \text{ Btu/mmBtu})$$

Where:

E = SO₂ emission rate from coke oven gas, in lb/mmBtu;

H₂S content = grains of H₂S in 100 scf of desulfurized coke oven gas recorded in Section A.III.2;

1 lb/7000 grains = conversion from pounds to grains;

1 scf/580 Btu = the heat value of 1 scf of coke oven gas;

64 SO₂/34 H₂S = the ratio of grams per mole of SO₂ to mole of H₂S; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

- (iii) If required, the permittee shall demonstrate compliance with this emission rate in accordance with 40 CFR Part 60, Appendix A, Methods 6 or 6C and the procedures in OAC rule 3745-18-04.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: P016 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: P017 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
750 mmBtu/hr, 56" mill reheat furnace, direct fired with natural gas, coke oven gas, or a mixture of natural gas and coke oven gas	OAC rule 3745-17-11 OAC rule 3745-17-07(A) OAC rule 3745-18-84(I)	None. See A.I.2.a below. None. See A.I.2.b below. Sulfur dioxide emissions shall not exceed 1.7 lbs/mmBtu actual heat input.

2. Additional Terms and Conditions

- a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
- b. This emissions unit is exempt from the visible particulate matter emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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II. Operational Restrictions

1. The permittee shall burn in this emissions unit only natural gas, desulfurized coke oven gas with a concentration of H2S less than 35 grains per 100 dry standard cubic feet (as an average for each rolling, 3-hour period), or a mixture of natural gas and desulfurized coke oven gas with a concentration of H2S less than 35 grains per 100 dry standard cubic feet (as an average for each rolling, 3-hour period).
2. The permittee shall not burn undesulfurized coke oven gas in this emissions unit.
3. This emissions unit can be fired with desulfurized coke oven gas produced by the ISG Warren facility, facility ID 02-78-00-0648. In accordance with 40 CFR 52.21 (Approval to Construct, Prevention of Significant Deterioration of Air Quality, September 27, 1977) and a Consent Order (Case No. C78-1659), the following coke oven gas quality specification applies to coke oven gas produced by coke battery number 4 at the ISG Warren facility, facility ID 02-78-00-0648, emissions unit B901:

No coke oven gas from coke battery number 4 at the ISG Warren facility, facility ID 02-78-00-0648, shall be burned unless it contains a concentration of sulfur compounds, expressed as H2S, of less than 35 grains per 100 dry standard cubic feet (dscf) of coke oven gas produced. The limit of 35 grains per 100 dscf includes the sulfur concentration in the desulfurized coke oven gas and the sulfur concentration in the desulfurization tail gas, combined, measured by continuous emissions monitoring at the desulfurization plant at the ISG Warren facility.

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III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, desulfurized coke oven gas with a concentration of H2S less than 35 grains per 100 dry standard cubic feet, or a mixture of natural gas and desulfurized coke oven gas with a concentration of H2S less than 35 grains per 100 dry standard cubic feet, the permittee shall maintain a record of the type, quantity, and quality of fuel burned in this emissions unit.
2. The permittee shall continuously monitor and record the sulfur content of the desulfurized coke oven gas burned in this emissions unit to ensure that the concentration of sulfur compounds is less than 35 grains per 100 dry standard cubic feet (as an average for each rolling, 3-hour period). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous sulfur dioxide and total reduced sulfur monitoring systems including, but not limited to, the grains of hydrogen sulfide per 100 dry standard cubic feet (dscf) for the desulfurized coke oven gas on a daily average basis, based upon the average emission rate for the actual hours of operation for this emissions unit during each calendar day.

In lieu of the above requirement, the permittee may accept the coke oven gas supplier's monitoring and record keeping for sulfur content in the desulfurized coke oven gas if said monitoring and record keeping meets the requirements of 40 CFR Part 60.13.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or desulfurized coke oven gas was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each rolling, 3-hour period during which the concentration of H₂S in the desulfurized coke oven gas burned in this emissions unit exceeded 35 grains per 100 dscf, and the actual H₂S content for each such 3-hour period.

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V. **Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Sulfur dioxide emissions shall not exceed 1.7 lbs/mmBtu actual heat input.

Applicable Compliance Method:

 - (i) To determine the actual emission rate for SO₂ from natural gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (0.6 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu})$$

Where:

E = SO₂ emission rate from natural gas, in lb/mmBtu;

0.6 lb/10⁶ scf = emission factor for SO₂ from burning natural gas from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.
 - (ii) To determine the actual emission rate for SO₂ from coke oven gas, the following equation may be used:

To determine the actual emission rate for SO₂ from coke oven gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (\text{H}_2\text{S content}) \times (1 \text{ lb}/7000 \text{ grains}) \times (1 \text{ scf}/580 \text{ Btu}) \times (64 \text{ SO}_2/34 \text{ H}_2\text{S}) \times (1,000,000 \text{ Btu/mmBtu})$$

Where:

E = SO₂ emission rate from coke oven gas, in lb/mmBtu;

H₂S content = grains of H₂S in 100 scf of desulfurized coke oven gas recorded in Section A.III.2;

1 lb/7000 grains = conversion from pounds to grains;

1 scf/580 Btu = the heat value of 1 scf of coke oven gas;

64 SO₂/34 H₂S = the ratio of grams per mole of SO₂ to mole of H₂S; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.
 - (iii) If required, the permittee shall demonstrate compliance with this emission rate in accordance with 40 CFR Part 60, Appendix A, Methods 6 or 6C and the procedures in OAC rule 3745-18-04.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P017 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P026 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Steel slab conditioning grinder #1, equipped with a baghouse	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the baghouse outlet shall not exceed twenty percent opacity as a six-minute average, except as provided by rule. See A.I.2.a below. See A.I.2.b below. The emission limitation established pursuant to this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). Particulate emissions shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases from the baghouse outlet. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).
	OAC rule 3745-17-07(B)(3)	
	OAC rule 3745-17-08(B)(3)	
	OAC rule 3745-17-11(B)(1)	
	OAC rule 3745-31-05(A)(3) PTI 02-4512	

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) through (9) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Steel slab conditioning grinder #1 is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. Steel slab conditioning grinder #1 is not located within the areas identified in "Appendix A" of the rule.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1 to 4 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each

year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from the baghouse outlet shall not exceed twenty percent opacity as a six-minute average, except as provided by OAC rule 3745-17-07.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Particulate emissions shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months of the issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limit for particulate emissions.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P026 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P027 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Steel slab conditioning grinder #2, equipped with a baghouse	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the baghouse outlet shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-07(B)(3)	See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.b below.
	OAC rule 3745-17-11(B)(1)	The emission limitation established pursuant to this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) PTI 02-4512	Particulate emissions shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases from the baghouse outlet.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) through (9) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Steel slab conditioning grinder #1 is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. Steel slab conditioning grinder #1 is not located within the areas identified in "Appendix A" of the rule.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3 to 7 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
- Visible particulate emissions from the baghouse outlet shall not exceed twenty percent opacity as a six-minute average, except as provided by OAC rule 3745-17-07.
- Applicable Compliance Method:
- If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
- b. Emission Limitation:
- Particulate emissions shall not exceed 0.010 grain per dry standard cubic foot of exhaust gases.
- Applicable Compliance Method:
- If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months of the issuance of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limit for particulate emissions.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 5 of 40 CFR Part 60, Appendix A.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P027 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall

not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P028 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Ladle refining process, including alloying material additions, argon stirring, and electric arc reheating, equipped with a baghouse for particulate control	OAC rule 3745-31-05(A)(3) PTI 02-4963	Visible particulate emissions from the baghouse outlet shall not exceed five percent opacity as a six-minute average. Particulate emissions from the baghouse outlet from the ladle refining process shall not exceed 0.0052 grain per dry standard cubic foot of exhaust gases. See

	A.I.2.c below.
OAC rule 3745-17-07(B)(3)	None. See A.I.2.a below.
OAC rule 3745-17-08(B)(3)	None. See A.I.2.b below.
OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) through (9) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. The ladle refining process is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. The ladle refining process is not located within the areas identified in "Appendix A" of the rule.
- c. All equipment and processes associated with this emissions unit, including alloying material additions, argon stirring, and electric arc reheating, shall be vented to the baghouse.

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II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 7 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.
- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
- 2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

- 1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from the baghouse outlet shall not exceed five percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions from the baghouse outlet from the ladle refining process shall not exceed 0.0052 grain per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limit for particulate emissions.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 5 of 40 CFR Part 60, Appendix A.
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P028 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

- | | <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|---|--------------------------------------|--|
| 2. Additional Terms and Conditions | | | |
| 1. None | | | |

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P029 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Vacuum degassing process, including alloying material additions, argon stirring, and vacuum degassing, equipped with a natural gas fired flare/CO burner	OAC rule 3745-31-05(A)(3) PTI 02-4963	Emissions of carbon monoxide from the vacuum degassing process shall not exceed 1.4 pounds per hour. See A.I.2.a below. Emissions of carbon monoxide from the vacuum degassing process shall be reduced by at least ninety-eight percent (98%) by weight. See A.I.2.a below. Visible particulate emissions from the vacuum degassing process shall not exceed five percent opacity

as a six-minute average.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 and 3745-17-11.

OAC rule 3745-17-07(B)(3)

None. See A.1.2.b below.

OAC rule 3745-17-08(B)(3)

None. See A.1.2.c below.

OAC rule 3745-17-11(B)(1)

Particulate emissions from the stack associated with this emissions unit shall not exceed 55.4 pounds per hour.

OAC rule 3745-17-07(A)(1)

The emission limitation established pursuant to this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- a. Stack test methods are not available to sample CO emissions after the natural gas fired flare/CO burner. Therefore, compliance with the CO emissions limitation and the requirement for 98% by weight CO emissions reduction shall be based upon flare design and the April 1996 report entitled "Dispersion Modeling Analysis of the Existing CO Flare at the WCI Steel, Inc., Plant Warren, Ohio" prepared by Environmental Quality Management, Inc.
- b. Pursuant to OAC rule 3745-17-07(B)(11), OAC rule 3745-17-07(B)(1) through (9) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC 3745-17-08. The vacuum degassing process is not located within the areas identified in "Appendix A" of the rule.
- c. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. The vacuum degassing process is not located within the areas identified in "Appendix A" of the rule.
- d. All equipment and processes associated with this emissions unit, including alloying material additions, argon stirring, and vacuum degassing, shall be vented to the flare.

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II. Operational Restrictions

- 1. A pilot flame shall be maintained at all times in the flare's pilot light burner.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall record the following information each day while the emissions unit is in operation:
 - a. All periods during which there was no pilot flame while the emissions unit is in operation.
 - b. The operating times for the flare, monitoring equipment, and the associated emissions unit.
- 2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all periods when the emissions unit was in operation during which the pilot flame was not functioning properly. The reports shall include the date, time, and duration of such period.
- 2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible

particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from the vacuum degassing process shall not exceed five percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modification listed in paragraph (B)(3)(b) of OAC rule 3745-17-03.
 - b. Emission Limitation:

Particulate emissions from the stack associated with this emissions unit shall not exceed 55.4 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P029 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P034 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
20 mmBtu/hr, natural gas fired, horizontal steel ladle dryer/preheater	OAC rule 3745-31-05(A)(3) PTI 02-0238	Particulate emissions shall not exceed 0.12 pound per hour. SO2 emissions shall not exceed 0.01 pound per hour. NOx emissions shall not exceed 2.61 pounds per hour. CO emissions shall not exceed 1.6 pounds per hour. VOC emissions shall not exceed 0.1 pound per hour.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B) OAC rule 3745-18-06(E)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-23-06 and OAC rule 3745-21-08. See Section A.I.2.a below. See Section A.I.2.b below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-21-08

See Section A.I.2.c below.

OAC rule 3745-23-06

See Section A.I.2.c below.

2. Additional Terms and Conditions

- a. Visible particulate emissions of any fugitive dust shall not exceed twenty percent opacity as a three-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- b. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the use of natural gas as fuel for this emissions unit.
- c. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 02-0238.

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1. The permittee shall only employ natural gas as fuel to dry/preheat the ladle.

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:

Particulate emissions shall not exceed 0.12 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 1.9 lbs/mmc from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - b. Emissions Limitation:

SO₂ emissions shall not exceed 0.01 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 0.60 lb/mmc from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - c. Emissions Limitation:

NO_x emissions shall not exceed 2.61 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 100 lbs/mmc from AP-42, Fifth Edition, Section 1.4, Table 1.4-1,

July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

d. Emissions Limitation:

CO emissions shall not exceed 1.6 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 84 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-1, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

e. Emissions Limitation:

VOC emissions shall not exceed 0.1 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 5.5 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

f. Emissions Limitation:

Visible particulate emissions from any fugitive source shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the modifications listed in paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. The points of observation for visible emissions shall include any non-stack egress points from the building, including but not limited to, doorways, windows, and roof monitors.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: P034 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P035 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
20 mmBtu/hr, natural gas fired, north vertical steel ladle dryer/preheater	OAC rule 3745-31-05(A)(3) PTI 02-0238	Particulate emissions shall not exceed 0.12 pound per hour. SO2 emissions shall not exceed 0.01 pound per hour. NOx emissions shall not exceed 2.61 pounds per hour. CO emissions shall not exceed 1.6 pounds per hour. VOC emissions shall not exceed 0.1 pound per hour.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B) OAC rule 3745-18-06(E)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-23-06 and OAC rule 3745-21-08. See Section A.I.2.a below. See Section A.I.2.b below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-21-08

See Section A.I.2.c below.

OAC rule 3745-23-06

See Section A.I.2.c below.

2. Additional Terms and Conditions

- a. Visible particulate emissions of any fugitive dust shall not exceed twenty percent opacity as a three-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- b. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the use of natural gas as fuel for this emissions unit.
- c. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 02-0238.

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******II. Operational Restrictions**

1. The permittee shall only employ natural gas as fuel to dry/preheat the ladle.

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:

Particulate emissions shall not exceed 0.12 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 1.9 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - b. Emissions Limitation:

SO₂ emissions shall not exceed 0.01 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 0.60 lb/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - c. Emissions Limitation:

NO_x emissions shall not exceed 2.61 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 100 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-1,

July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

d. Emissions Limitation:

CO emissions shall not exceed 1.6 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 84 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-1, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

e. Emissions Limitation:

VOC emissions shall not exceed 0.1 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 5.5 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

f. Emissions Limitation:

Visible particulate emissions from any fugitive source shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the modifications listed in paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. The points of observation for visible emissions shall include any non-stack egress points from the building, including but not limited to, doorways, windows, and roof monitors.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: P035 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P036 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
20 mmBtu/hr, natural gas fired, south vertical steel ladle dryer/preheater	OAC rule 3745-31-05(A)(3) PTI 02-0238	Particulate emissions shall not exceed 0.12 pound per hour. SO2 emissions shall not exceed 0.01 pound per hour. NOx emissions shall not exceed 2.61 pounds per hour. CO emissions shall not exceed 1.6 pounds per hour. VOC emissions shall not exceed 0.1 pound per hour.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B) OAC rule 3745-18-06(E)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-23-06 and OAC rule 3745-21-08. See Section A.I.2.a below. See Section A.I.2.b below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-21-08

See Section A.I.2.c below.

OAC rule 3745-23-06

See Section A.I.2.c below.

2. Additional Terms and Conditions

- a. Visible particulate emissions of any fugitive dust shall not exceed twenty percent opacity as a three-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- b. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the use of natural gas as fuel for this emissions unit.
- c. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 02-0238.

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******II. Operational Restrictions**

1. The permittee shall only employ natural gas as fuel to dry/preheat the ladle.

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:

NOx emissions shall not exceed 2.61 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 1.9 lb/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - b. Emissions Limitation:

SO2 emissions shall not exceed 0.01 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 0.60 lb/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - c. Emissions Limitation:

NOx emissions shall not exceed 2.61 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 100 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-1,

July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

d. Emissions Limitation:

CO emissions shall not exceed 1.6 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 84 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-1, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

e. Emissions Limitation:

VOC emissions shall not exceed 0.1 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 20 mmBtu/hr, by the emission factor of 5.5 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

f. Emissions Limitation:

Visible particulate emissions from any fugitive source shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the modifications listed in paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. The points of observation for visible emissions shall include any non-stack egress points from the building, including but not limited to, doorways, windows, and roof monitors.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

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Facility ID: 0278000463 Emissions Unit ID: P036 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P037 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 mmBtu/hr, natural gas fired, BOF vessel no. 1 ladle preheater	OAC rule 3745-31-05(A)(3) PTI 02-0238	Particulate emissions shall not exceed 0.06 pound per hour. SO2 emissions shall not exceed 0.006 pound per hour. NOx emissions shall not exceed 1.30 pounds per hour. CO emissions shall not exceed 0.783 pound per hour. VOC emissions shall not exceed 0.05 pound per hour.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B) OAC rule 3745-18-06(E)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-23-06 and OAC rule 3745-21-08. See Section A.I.2.a below. See Section A.I.2.b below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-21-08

See Section A.I.2.c below.

OAC rule 3745-23-06

See Section A.I.2.c below.

2. Additional Terms and Conditions

- a. Visible particulate emissions of any fugitive dust shall not exceed twenty percent opacity as a three-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- b. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the use of natural gas as fuel for this emissions unit.
- c. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 02-0238.

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******II. Operational Restrictions**

1. The permittee shall only employ natural gas as fuel to preheat the ladle.

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:

Particulate emissions shall not exceed 0.06 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 10 mmBtu/hr, by the emission factor of 1.9 lbs/mmc from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - b. Emissions Limitation:

SO₂ emissions shall not exceed 0.006 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 10 mmBtu/hr, by the emission factor of 0.60 lb/mmc from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - c. Emissions Limitation:

NO_x emissions shall not exceed 1.30 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 10 mmBtu/hr, by the emission factor of 100 lbs/mmc from AP-42, Fifth Edition, Section 1.4, Table 1.4-1,

July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

d. Emissions Limitation:

CO emissions shall not exceed 0.783 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 10 mmBtu/hr, by the emission factor of 84 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-1, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

e. Emissions Limitation:

VOC emissions shall not exceed 0.05 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 10 mmBtu/hr, by the emission factor of 5.5 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

f. Emissions Limitation:

Visible particulate emissions from any fugitive source shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the modifications listed in paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. The points of observation for visible emissions shall include any non-stack egress points from the building, including but not limited to, doorways, windows, and roof monitors.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: P037 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P038 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10 mmBtu/hr, natural gas fired, BOF vessel no. 2 ladle preheater	OAC rule 3745-31-05(A)(3) PTI 02-0238	Particulate emissions shall not exceed 0.06 pound per hour. SO2 emissions shall not exceed 0.006 pound per hour. NOx emissions shall not exceed 1.30 pounds per hour. CO emissions shall not exceed 0.783 pound per hour. VOC emissions shall not exceed 0.05 pound per hour.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B) OAC rule 3745-18-06(E)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-23-06 and OAC rule 3745-21-08. See Section A.I.2.a below. See Section A.I.2.b below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-21-08

See Section A.I.2.c below.

OAC rule 3745-23-06

See Section A.I.2.c below.

2. Additional Terms and Conditions

- a. Visible particulate emissions of any fugitive dust shall not exceed twenty percent opacity as a three-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- b. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the use of natural gas as fuel for this emissions unit.
- c. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 02-0238.

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******II. Operational Restrictions**

1. The permittee shall only employ natural gas as fuel to preheat the ladle.

[Go to the top of this document](#)[Go to the top of Part III for this Emissions Unit](#)*****THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.*******III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:

Particulate emissions shall not exceed 0.06 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 10 mmBtu/hr, by the emission factor of 1.9 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - b. Emissions Limitation:

SO₂ emissions shall not exceed 0.006 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 10 mmBtu/hr, by the emission factor of 0.60 lb/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - c. Emissions Limitation:

NO_x emissions shall not exceed 1.30 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 10 mmBtu/hr, by the emission factor of 100 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-1,

July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

d. Emissions Limitation:

CO emissions shall not exceed 0.783 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 10 mmBtu/hr, by the emission factor of 84 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-1, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

e. Emissions Limitation:

VOC emissions shall not exceed 0.05 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 10 mmBtu/hr, by the emission factor of 5.5 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

f. Emissions Limitation:

Visible particulate emissions from any fugitive source shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the modifications listed in paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. The points of observation for visible emissions shall include any non-stack egress points from the building, including but not limited to, doorways, windows, and roof monitors.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P038 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION.

VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P039 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
15 mmBtu/hr, natural gas fired, iron ladle drying stand	OAC rule 3745-31-05(A)(3) PTI 02-0238	Particulate emissions shall not exceed 0.09 pound per hour. SO2 emissions shall not exceed 0.008 pound per hour. NOx emissions shall not exceed 1.96 pounds per hour. CO emissions shall not exceed 1.20 pounds per hour. VOC emissions shall not exceed 0.08 pound per hour.
	OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B) OAC rule 3745-18-06(E)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-23-06 and OAC rule 3745-21-08. See Section A.I.2.a below. See Section A.I.2.b below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-21-08

See Section A.I.2.c below.

OAC rule 3745-23-06

See Section A.I.2.c below.

2. Additional Terms and Conditions

- a. Visible particulate emissions of any fugitive dust shall not exceed twenty percent opacity as a three-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- b. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the use of natural gas as fuel for this emissions unit.
- c. The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 02-0238.

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1. The permittee shall only employ natural gas as fuel for the iron ladle drying stand.

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1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emissions Limitation:

Particulate emissions shall not exceed 0.09 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 15 mmBtu/hr, by the emission factor of 1.9 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - b. Emissions Limitation:

SO₂ emissions shall not exceed 0.008 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 15 mmBtu/hr, by the emission factor of 0.60 lb/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.
 - c. Emissions Limitation:

NO_x emissions shall not exceed 1.96 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 15 mmBtu/hr, by the emission factor of 100 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-1,

July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

d. Emissions Limitation:

CO emissions shall not exceed 1.20 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 15 mmBtu/hr, by the emission factor of 84 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-1, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

e. Emissions Limitation:

VOC emissions shall not exceed 0.08 pound per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum rated capacity of the fuel burner, 15 mmBtu/hr, by the emission factor of 5.5 lbs/mmcf from AP-42, Fifth Edition, Section 1.4, Table 1.4-2, July 1998. The product shall then be multiplied by the conversion factor of 1 cf/1073 Btu.

f. Emissions Limitation:

Visible particulate emissions from any fugitive source shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the modifications listed in paragraph (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03. The points of observation for visible emissions shall include any non-stack egress points from the building, including but not limited to, doorways, windows, and roof monitors.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: P039 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: P040 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
54" temper mill, equipped with mist eliminators	OAC rule 3745-17-07(B)(1)	Visible fugitive particulate emissions from this emissions unit shall not exceed twenty percent opacity as a three-minute average from any building openings. reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from this emissions unit (See A.I.2.a below.)
	OAC rule 3745-17-08(B)(3)	
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity as a six-minute average.
	OAC rule 3745-17-11(B)(1)	Particulate emissions from the stack associated with this emissions unit shall not exceed 52.1 pounds per hour. See A.I.2.b below.

2. Additional Terms and Conditions

- a. The permittee shall employ reasonably available control measures that include the use of fans, and ductwork to adequately enclose, contain, and capture the particulate emissions, and vent the captured emissions to the mist eliminators. The collection efficiency of such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- b. The particulate emissions limitation of 52.1 pounds per hour is based upon a process weight rate of 108 tons per hour and Table I of OAC rule 3745-17-11. If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II of OAC rule 3745-17-11 is more stringent than 52.1 lbs/hour, the permittee shall comply with the more stringent limitation.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible fugitive particulate emissions from this emissions unit shall not exceed twenty percent opacity as a three-minute average from any building openings.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - c. Emission Limitation:

Particulate emissions from the stack associated with this emissions unit shall not exceed 52.1 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months of the effective date of this permit.
 - b. The emission testing shall be conducted at the outlet of the settling chamber to demonstrate compliance with the allowable mass emission limitation for particulates.
 - c. A particulate emissions test also shall be conducted at the inlet of the mist eliminators to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11.
 - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
3. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P040 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: P901 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Coke-fired blast furnace, equipped with a baghouse for casthouse fugitive emissions, a venturi scrubber for the primary emissions, and waste gas flare	OAC rule 3745-18-06(E)(1)	Sulfur dioxide emissions from the stove stacks shall not exceed 740.3 lbs/hour.
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust from blast furnace charging shall not exceed twenty percent opacity as a three-minute average.
	OAC rule 3745-17-08(B)(3)	The permittee shall employ reasonably available control measures during charging that are sufficient to minimize or eliminate visible emissions of fugitive dust from blast furnace charging. See A.I.2.a below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the blast furnace stove stacks shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions from the blast furnace stove stacks shall not exceed 59.5 pounds per hour. See A.I.2.b below.
	OAC rule 3745-31-05(A)(3) PTI 02-484	The emission limitation established pursuant to this rule for particulate emissions from casthouse #1 is equivalent to the emission limitation established pursuant to 40 CFR 52.21 and PSD permit #5-79-A-8.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the baghouse for casthouse #1 shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-08(B)(3)	The emission limitation/control requirements established pursuant to this rule for casthouse #1 are less stringent than the emission limitation/control requirements established pursuant to 40 CFR 52.21.
	OAC rule 3745-17-07(B)(3)	Visible particulate emissions of fugitive dust from the casthouse #1 roof monitors shall not exceed twenty percent opacity as a six-minute average.
	40 CFR 52.21 PSD permit #5-79-A-8	Particulate emissions from the baghouse for casthouse #1 shall not exceed 0.030 lb/ton of iron produced.
		The emissions from the iron and slag notches to skimmer area and the spouts in casthouse #1 shall be hooded and exhausted to the baghouse for casthouse #1. See A.I.2.c below.
	OAC rule 3745-31-05(A)(3) PTI 02-484	The emission limitation established pursuant to this rule for particulate emissions from casthouse #2 is equivalent to the emission limitation established pursuant to 40 CFR 52.21 and PSD permit #5-79-A-8.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the baghouse for casthouse #2 shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-08(B)(3)	The emission limitation/control requirements established pursuant to this rule for casthouse #2 are less stringent than the emission limitation/control requirements established pursuant to 40 CFR 52.21.
	OAC rule 3745-17-07(B)(3)	Visible particulate emissions of fugitive dust from the casthouse #2 roof monitors shall not exceed twenty percent opacity as a six-minute average.
40 CFR 52.21 PSD permit #5-79-A-8	Particulate emissions from the baghouse for casthouse #2 shall not exceed 0.030 lb/ton of iron produced.	
	The emissions from the iron and slag notches, spouts, and runners in casthouse #2 shall be hooded and exhausted to the baghouse for casthouse #2. See A.I.2.d below.	

40 CFR, Part 63, Subpart FFFFF See Section A.I.2.e.

2. Additional Terms and Conditions

- a. The permittee shall charge this emissions unit only with screened or low fines raw materials in order to minimize or eliminate visible particulate emissions of fugitive dust.
- b. Based upon Table I in OAC rule 3745-17-11 and the maximum process weight rate for this emissions unit, the allowable rate of particulate emissions is 59.5 pounds per hour. The allowable emission rate obtained from Figure II is less stringent than the allowable emission rate obtained from Table I of OAC rule 3745-17-11.
- c. The existing emission capture system, consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts, shall be maintained and employed in accordance with the following standard operating practices. When casthouse #1 is used, the main isolation valve from casthouse #2 shall be closed to achieve the maximum gas flow in the collection main from casthouse #1. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.
- d. The existing emission capture system, consisting of a primary hood over the tap hole and trough area and fixed local hoods over the iron pouring spouts, shall be maintained and employed in accordance with the following standard operating practices. When casthouse #2 is used, the main isolation valve from casthouse #1 shall be closed to achieve the maximum gas flow in the collection main from casthouse #2. The movable trough area hood must be lowered into proper position prior to each cast. When iron is being poured from any one spout, that spout's local hood damper must be open and the remaining two spout hood dampers must be closed.
- e. On July 13, 2001, U.S. EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel, at 40 CFR, Part 63, Subpart FFFFF. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Section A.IV.5, A.IV.6, and A.IV.7 for required reporting pertaining to these requirements.

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1. The pressure drop across the casthouse baghouse shall be maintained within the range of 3.5 to 8 inches of water while the emissions unit is in operation.
2. The pressure drop across the primary venturi scrubber shall be maintained at a minimum of 50 inches of water at all times while the emissions unit is in operation.
3. The scrubber water flow rate for the primary venturi scrubber shall be continuously maintained at a value of not less than 1000 gallons per minute at all times while the emissions unit is in operation.
4. The coke burned in this emissions unit shall have a sulfur content, on a dry basis, that is sufficient to comply with the allowable sulfur dioxide emission limitation of 740.3 pounds sulfur dioxide/hour.

Compliance with the above-mentioned specification shall be based upon the analytical results for the composite sample of coke collected during each calendar month.

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1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the casthouse baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the cast house baghouse on a daily basis.
2. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the primary venturi scrubber and the scrubber water flow rate for the primary venturi scrubber while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information each shift while the scrubber is operating:

- a. The pressure drop across the scrubber, in inches of water;
 - b. The scrubber water flow rate, in gallons per minute; and
 - c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the casthouses and charging operations.

The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

4. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. the quantity of iron produced, in tons per hour; and
 - b. the hours of operation.
5. The permittee shall collect a representative sample of each shipment of coke which is received for charging. The coke sampling shall be performed in accordance with ASTM method D346-90, Standard Practice for Collection and Preparation of Coke Samples for Laboratory Analysis. At the end of each calendar month, the representative samples of coke from all shipments of coke which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coke shall be analyzed for sulfur content (percent). The analytical methods for sulfur content shall be: Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.
6. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the quantity of coke burned, in pounds;
 - b. the sulfur content of the coke burned (as determined in A.1.III.5), as a weight fraction;
 - c. the hours of operation;
 - d. the total sulfur dioxide emissions (2.0 x a x b), in pounds; and
 - e. the average hourly sulfur dioxide emission rate (d/c).

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the casthouse baghouse did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following wet scrubber parameters were not maintained at or above the required levels:
 - a. the static pressure drop across the scrubber; and
 - b. the scrubber water flow rate for the scrubber.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the casthouses and charging operations and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. Quarterly reports shall be submitted concerning the analytical results of the composite coke samples and the quantities of the coke charged in this emissions unit.

The quarterly reports shall include the following information for each month during the calendar quarter:

 - a. the total quantity of coke charged (tons);
 - b. the average sulfur content (percent) of the coke charged; and
 - c. the average hourly sulfur dioxide emission rate, in pounds per hour.

These quarterly reports shall be submitted by February 15, May 15, August 15 and November 15 of each year, unless otherwise specified by the appropriate Ohio EPA District Office or local air agency, and shall cover the data obtained during the previous calendar quarters.

5. The permittee will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel, at 40 CFR, Part 63, Subpart FFFFF. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR, Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.
 - a. If the final MACT Standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S. EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.
 1.
 - i. For a new affected source, the anticipated date of startup of operation.
 - ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.
 - iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.
 - iv. For each affected emission point or group of affected emission points, an identification of control technology in place.
 - v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.
 - vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR, Part 63.
 - b. The Part II application for a MACT determination may, but is not required to, contain the following information:
 - i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.
 - ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.
 - iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
7. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:
 - a. Within 120 days after promulgation of 40 CFR, Part 63, Subpart FFFFF, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - i. the name and mailing address of the permittee;
 - ii. the physical location of the source if it is different from the mailing address;
 - iii. identification of the relevant MACT standard and the permittee's compliance date;
 - iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
 - b. Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart FFFFF, the permittee shall submit a notification of compliance status that contains the following information:
 - i. the methods used to determine compliance;
 - ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;

- iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in according with the test methods specified in 40 CFR, Part 63, Subpart FFFFF;
- v. an analysis demonstrating whether the affected source is a major source or an area source;
- vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
- vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart FFFFF.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions of fugitive dust from blast furnace charging shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Sulfur dioxide emissions from shall not exceed 740.3 lbs/hour.

Applicable Compliance Method:

 - i. To determine the emission rate for SO₂, the following equation may be used:

$$E(\text{SO}_2) = \text{TPH} \times \text{OH} \times 3 \text{ lbs/ton}$$

Where:

$E(\text{SO}_2)$ = SO₂ emission rate, in lbs SO₂/hr;

TPH = the quantity of iron produced, in tons per hour from Section A.III.4.a;

OH = the hours of operation from Section A.III.4.b; and

3 lbs/ton = emission factor for SO₂ from FIRE database for blast furnace casting.
 - ii. Compliance may be based upon the monitoring and record keeping in Sections A.III.5 and A.III.6 of these terms and conditions.
 - iii. If required, the permittee shall demonstrate compliance with this emission rate in accordance with 40 CFR Part 60, Appendix A, Methods 6 or 6C and the procedures in OAC rule 3745-18-04.
- c. Emission Limitation:

Visible particulate emissions from the blast furnace stove stacks shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).
- d. Emission Limitation:

Particulate emissions from the blast furnace stove stacks shall not exceed 59.5 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).
- e. Emission Limitation:

Particulate emissions from the casthouse baghouse shall not exceed 0.030 lb/ton of iron produced.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

f. Emission Limitation:

Visible particulate emissions of fugitive dust from each casthouse shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

g. Emission Limitation:

Visible particulate emissions from the casthouse baghouse shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after issuance of this permit, between years 2 and 3 after issuance of this permit, and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limits for particulate emissions from the stove stacks and the baghouse.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 5 of 40 CFR Part 60, Appendix A.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P901 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under

state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: P902 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Koppers Co. basic oxygen furnace (BOF) #1, equipped with a GAW damper and an electrostatic precipitator (ESP)	OAC rule 3745-18-06(E)(1)	Sulfur dioxide emissions shall not exceed 861.8 lbs/hour.
	OAC rule 3745-17-11(B)(1)	Total particulate emissions from melting, refining, and slag blowing shall not exceed 60.1 pounds per hour. See A.I.2.c below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by rule. See Section A.I.2.e.
Basic oxygen furnace coal/tire injection and slag blowing/splashing	40 CFR, Part 63, Subpart FFFFF	
	OAC rule 3745-31-05(A)(3) PTI 02-8955	Visible particulate emissions of fugitive dust from slag blowing/splashing and/or coal/tire injection shall not exceed five percent opacity from the BOF roof monitor as an average of the 15-second opacity readings over the slag blowing/splashing or coal/tire injection periods. None. See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	None. See A.I.2.b below.
Basic oxygen furnace tapping	OAC rule 3745-17-08(B)(3)	
	OAC rule 3745-17-07(B)(1)	None. See A.I.2.a below.
Basic oxygen furnace charging	OAC rule 3745-17-08(B)(3)	None. See A.I.2.b below.
	OAC rule 3745-17-07(B)(1)	None. See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	None. See A.I.2.b below.

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Basic oxygen furnace #1 is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. Basic oxygen furnace #1 is not located within the areas identified in "Appendix A" of the rule.
- c. The particulate emissions limitation of 60.1 pounds per hour is based upon curve P-1 (equation b) in Figure II of OAC rule 3745-17-11 and an uncontrolled mass rate of emission of 7837.5 pounds per hour. The uncontrolled mass rate of emission was calculated using the maximum process weight rate of 275 tons per hour provided in the permit application and an emission factor of 28.5 pounds per ton for uncontrolled basic oxygen furnace (BOF) particulate emissions from AP-42, Table 12.5-1 (10/86). Based upon Table I in OAC rule 3745-17-11 and the maximum process weight rate for this emissions unit, the allowable rate of particulate emissions is 62 pounds per hour. Since the allowable rate obtained from Figure II is more stringent than the allowable rate obtained from Table I of OAC rule 3745-17-11, the allowable mass rate of particulate emissions from the BOF is 60.1 pounds per hour.
- d. Permit to Install 02-8955 provided an allowable particulate emission rate of 0.21 pound per hour from slag blowing. Since actual particulate emissions from melting, refining, and slag blowing occur simultaneously, particulate emissions from the stack cannot be quantified by process. Therefore, compliance with the total allowable emission limitation of 60.1 pounds per hour will be used to demonstrate compliance with the allowable particulate emissions for melting, refining, and slag blowing.
- e. On July 13, 2001, U.S. EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel, at 40 CFR, Part 63, Subpart FFFFF. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Section A.IV.4, A.IV.5, and A.IV.6 for required reporting pertaining to these requirements.

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II. Operational Restrictions

- 1. The average total combined power input (in kilowatts) to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90% of the total combined power input, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to continuously monitor the secondary voltage, in kilovolts, and the secondary current, in amps, in all fields of the ESP while the emissions unit is in operation. The secondary voltage and secondary current monitors shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall monitor and record the following on an hourly basis during any operation of the ESP:
 - a. the secondary voltage, in kilovolts (kV), and the secondary current, in amps, for each transformer rectifier (TR) set in the ESP;
 - b. the power input (in kilowatts) of each TR set for each hour (calculated by multiplying the secondary voltage (in kV) by the secondary current (in amps) for each TR set; and
 - c. the total power input to the ESP for each hour (add together the power inputs for the TR sets operating during the hour).
2. The permittee shall record the following information for each day:
 - a. all 3-hour blocks of time during which the average total combined power input to the ESP, when the emissions unit was in operation, was less than 90% of the total combined power input, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation; and
 - b. the duration of the downtime for the monitoring equipment specified in Section A.III.1 above, the ESP sections that are out of service, and the duration of the downtime for each section, when the associated emissions unit was in operation.
3. No monitoring or record keeping is required for the sulfur dioxide emission limit for this emissions unit because the maximum uncontrolled emission rate of sulfur dioxide cannot exceed the allowable emission limit.
4. The permittee shall perform daily checks, when the emissions unit is in operation during coal/tire injection and/or slag blowing/spashing, for any visible fugitive particulate emissions from the roof monitors serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

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IV. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify the following:
 - a. all 3-hour blocks of time during which the average total combined power input to all fields of the ESP does not comply with the operational restriction specified in Section A.II.1 of this permit; and
 - b. all periods of time during start up and shutdown of the emissions unit when the ESP was not in operation and the temperature of the BOF exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i).
The deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall also submit quarterly reports which identify the sections of the ESP that were out of service along with the time period(s) involved.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the roof monitors serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel, at 40 CFR, Part 63, Subpart FFFFF. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR, Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.
 - a. If the final MACT Standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be

- submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S. EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.
1.
 - i. For a new affected source, the anticipated date of startup of operation.
 - ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.
 - iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.
 - iv. For each affected emission point or group of affected emission points, an identification of control technology in place.
 - v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.
 - vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR, Part 63.
 - b. The Part II application for a MACT determination may, but is not required to, contain the following information:
 - i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.
 - ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.
 - iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
6. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:
- a. Within 120 days after promulgation of 40 CFR, Part 63, Subpart FFFFF, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - i. the name and mailing address of the permittee;
 - ii. the physical location of the source if it is different from the mailing address;
 - iii. identification of the relevant MACT standard and the permittee's compliance date;
 - iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
 - b. Within 60 days following completion of any required compliance demonstration activity specified in the 40 CFR, Part 63, Subpart FFFFF, the permittee shall submit a notification of compliance status that contains the following information:
 - i. the methods used to determine compliance;
 - ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart FFFFF;
 - v. an analysis demonstrating whether the affected source is a major source or an area source;
 - vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
 - vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart FFFFF.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from the stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Visible particulate emissions from slag blowing/splashing and/or coal/tire Injection shall not exceed five percent opacity from the BOF roof monitor as an average of the 15-second opacity readings over the slag blowing/splashing or coal/tire injection periods.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).
 - c. Emission Limitation:

Particulate emissions from melting, refining, and slag blowing shall not exceed 60.1 pounds per hour from the stack associated with this emissions unit.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).
 - d. Emission Limitation:

Sulfur dioxide emissions shall not exceed 861.8 lbs/hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission rate in accordance with 40 CFR Part 60, Appendix A, Methods 6 or 6C and the procedures in OAC rule 3745-18-04.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after issuance of this permit, between years 2 and 3 after issuance of this permit, and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limit for particulate emissions.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P902 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P903 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Koppers Co. basic oxygen furnace (BOF) #2 equipped with a GAW damper and an electrostatic precipitator (ESP)	OAC rule 3745-18-06(E)(1)	Sulfur dioxide emissions shall not exceed 861.8 lbs/hour.
	OAC rule 3745-17-11(B)(1)	Total particulate emissions from melting, refining, and slag blowing shall not exceed 60.1 pounds per hour. See A.I.2.c below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by rule. See Section A.I.2.e.
Basic oxygen furnace coal/tire injection and slag blowing/splashing	40 CFR, Part 63, Subpart FFFFF	
	OAC rule 3745-31-05(A)(3) PTI 02-8955	Visible particulate emissions of fugitive dust from slag blowing/splashing and/or coal/tire injection shall not exceed five percent opacity from the BOF roof monitor as an average of the 15-second opacity readings over the slag blowing/splashing or coal/tire injection periods. None. See A.I.2.a below.
		None. See A.I.2.b below.
Basic oxygen furnace tapping	OAC rule 3745-17-07(B)(1)	
	OAC rule 3745-17-08(B)(3) OAC rule 3745-17-07(B)(1)	None. See A.I.2.a below.
Basic oxygen furnace charging	OAC rule 3745-17-08(B)(3) OAC rule 3745-17-07(B)(1)	None. See A.I.2.b below. None. See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	None. See A.I.2.b below.

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) shall not apply to any fugitive dust source which is not located within the geographical areas identified in "Appendix A" of OAC rule 3745-17-08. Basic oxygen furnace #2 is not located within the areas identified in "Appendix A" of the rule.
- b. Pursuant to OAC rule 3745-17-08(A)(1), OAC rule 3745-17-08(B) shall apply to any fugitive dust source which is located within the areas identified in "Appendix A" of the rule. Basic oxygen furnace #2 is not located within the areas identified in "Appendix A" of the rule.
- c. The particulate emissions limitation of 60.1 pounds per hour is based upon curve P-1 (equation b) in Figure II of OAC rule 3745-17-11 and an uncontrolled mass rate of emission of 7837.5 pounds per hour. The uncontrolled mass rate of emission was calculated using the maximum process weight rate of 275 tons per hour provided in the permit application and an emission factor of 28.5 pounds per ton for uncontrolled basic oxygen furnace (BOF) particulate emissions from AP-42, Table 12.5-1 (10/86). Based upon Table I in OAC rule 3745-17-11 and the maximum process weight rate for this emissions unit, the allowable rate of particulate emissions is 62 pounds per hour. Since the allowable rate obtained from Figure II is more stringent than the allowable rate obtained from Table I of OAC rule 3745-17-11, the allowable mass rate of particulate emissions from the BOF is 60.1 pounds per hour.

- d. Permit to Install 02-8955 provided an allowable particulate emission rate of 0.21 pound per hour from slag blowing. Since actual particulate emissions from melting, refining, and slag blowing occur simultaneously, particulate emissions from the stack cannot be quantified by process. Therefore, compliance with the total allowable emission limitation of 60.1 pounds per hour will be used to demonstrate compliance with the allowable particulate emissions for melting, refining, and slag blowing.
- e. On July 13, 2001, U.S. EPA proposed the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel, at 40 CFR, Part 63, Subpart FFFFF. When the NESHAP is promulgated, the facility will be subject to the rules as an existing major source with a compliance date as specified in the NESHAP. See Section A.IV.4, A.IV.5, and A.IV.6 for required reporting pertaining to these requirements.

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II. Operational Restrictions

1. The average total combined power input (in kilowatts) to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90% of the total combined power input, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the secondary voltage, in kilovolts, and the secondary current, in amps, in all fields of the ESP while the emissions unit is in operation. The secondary voltage and secondary current monitors shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall monitor and record the following on an hourly basis during any operation of the ESP:
 - a. the secondary voltage, in kilovolts (kV), and the secondary current, in amps, for each transformer rectifier (TR) set in the ESP;
 - b. the power input (in kilowatts) of each TR set for each hour (calculated by multiplying the secondary voltage (in kV) by the secondary current (in amps) for each TR set; and
 - c. the total power input to the ESP for each hour (add together the power inputs for the TR sets operating during the hour).
2. The permittee shall record the following information for each day:
 - a. all 3-hour blocks of time during which the average total combined power input to the ESP, when the emissions unit was in operation, was less than 90% of the total combined power input, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation; and
 - b. the duration of the downtime for the monitoring equipment specified in Section A.III.1 above, the ESP sections that are out of service, and the duration of the downtime for each section, when the associated emissions unit was in operation.
3. No monitoring or record keeping is required for the sulfur dioxide emission limit for this emissions unit because the maximum uncontrolled emission rate of sulfur dioxide cannot exceed the allowable emission limit.
4. The permittee shall perform daily checks, when the emissions unit is in operation during coal/tire injection and/or slag blowing/spashing, for any visible fugitive particulate emissions from the roof monitors serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following:
 - a. all 3-hour blocks of time during which the average total combined power input to all fields of the ESP does not comply with the operational restriction specified in Section A.II.1 of this permit; and
 - b. all periods of time during start up and shutdown of the emissions unit when the ESP was not in operation

and the temperature of the BOF exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07 (A)(3)(a)(i) and (b)(i).

The deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall also submit quarterly reports which identify the sections of the ESP that were out of service along with the time period(s) involved.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the roof monitors serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee will be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel, at 40 CFR, Part 63, Subpart FFFFF. U.S. EPA failed to promulgate this standard by May 15, 2002, the Maximum Achievable Control Technology (MACT) hammer date. In accordance with 40 CFR, Part 63, Subpart B (40 CFR Parts 63.50 through 63.56), the permittee shall submit an application to revise the permit to include equivalent emission limitations as a result of a case-by-case MACT determination. The application shall be submitted in two parts: The deadline to submit the Part I application as specified in 40 CFR Part 63.53 was May 15, 2002.
 - a. If the final MACT Standard is not promulgated by the deadline specified by U.S. EPA, the permittee shall submit the Part II application as specified in 40 CFR Part 63.53. The Part II application shall be submitted within 60 days after the deadline to promulgate the respective standard, as specified by the settlement between U.S. EPA and Sierra Club. It must contain the information in paragraphs (i) through (vi) of this section.
 1.
 - i. For a new affected source, the anticipated date of startup of operation.
 - ii. The hazardous air pollutants emitted by each affected source in the relevant source category and an estimated total uncontrolled and controlled emission rate for hazardous air pollutants from the affected source.
 - iii. Any existing federal, State, or local limitations or requirements applicable to the affected source.
 - iv. For each affected emission point or group of affected emission points, an identification of control technology in place.
 - v. Information relevant to establishing the MACT floor (or MACT emission limitation), and, at the option of the permittee, a recommended MACT floor.
 - vi. Any other information reasonably needed by the permitting authority including, at the discretion of the permitting authority, information required pursuant to Subpart A of 40 CFR, Part 63.
 - b. The Part II application for a MACT determination may, but is not required to, contain the following information:
 - i. Recommended emission limitations for the affected source and support information. The permittee may recommend a specific design, equipment, work practice, or operational standard, or combination thereof, as an emission limitation.
 - ii. A description of the control technologies that would be applied to meet the emission limitation including technical information on the design, operation, size, estimated control efficiency and any other information deemed appropriate by the permitting authority, and identification of the affected sources to which the control technologies must be applied.
 - iii. Relevant parameters to be monitored and frequency of monitoring to demonstrate continuous compliance with the MACT emission limitation over the applicable reporting period.
 6. If the NESHAP is promulgated before May 15, 2004, the facility will be subject as an existing major source with a compliance date as specified in the NESHAP. Pursuant to the Subpart, the permittee shall submit the following notifications:
 - a. Within 120 days after promulgation of 40 CFR, Part 63, Subpart FFFFF, the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - i. the name and mailing address of the permittee;
 - ii. the physical location of the source if it is different from the mailing address;
 - iii. identification of the relevant MACT standard and the permittee's compliance date;
 - iv. a brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - v. a statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
 - b. Within 60 days following completion of any required compliance demonstration activity specified in the 40

CFR, Part 63, Subpart FFFFF, the permittee shall submit a notification of compliance status that contains the following information:

- i. the methods used to determine compliance;
- ii. the results of any performance test, opacity or visible emission observations, continuous monitoring systems (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
- iii. the methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
- iv. the type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR, Part 63, Subpart FFFFF;
- v. an analysis demonstrating whether the affected source is a major source or an area source;
- vi. a description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and
- vii. a statement of whether or not the permittee has complied with the requirements of 40 CFR, Part 63, Subpart FFFFF.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from the stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Visible particulate emissions from slag blowing/splashing and/or coal/tire Injection shall not exceed five percent opacity from the BOF roof monitor as an average of the 15-second opacity readings over the slag blowing/splashing or coal/tire injection periods.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).
 - c. Emission Limitation:

Particulate emissions from melting, refining, and slag blowing shall not exceed 60.1 pounds per hour from the stack associated with this emissions unit.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).
 - d. Emission Limitation:

Sulfur dioxide emissions shall not exceed 861.8 lbs/hour.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission rate in accordance with 40 CFR Part 60, Appendix A, Methods 6 or 6C and the procedures in OAC rule 3745-18-04.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after issuance of this permit, between years 2 and 3 after issuance of this permit, and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission

limit for particulate emissions.

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: P903 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0278000463 Emissions Unit ID: P905 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pellet/ore receiving and handling (including unloading, conveying, transfer, and screening)	OAC rule 3745-31-05(A)(3) PTI 02-14116	Particulate emissions from the baghouse outlet associated with pellet ore rail car unloading shall not exceed 0.015 pound per hour and 0.063 ton per year.
		Particulate emissions from the baghouse outlet associated with pellet ore transfer at the transfer station shall not exceed 0.016 pound per hour and 0.07 ton per year.
		Particulate emissions from the baghouse outlet associated with pellet ore screening shall not exceed 0.021 pound per hour and 0.092 ton per year.
		Fugitive particulate emissions from all operations associated with this emissions unit shall not exceed 7.3 tons per year. See A.I.2.a below.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-07(A)(1), and 3745-17-08(B).
	OAC rule 3745-17-07(B)(1)	Visible fugitive particulate emissions from any enclosures associated with this emissions unit shall not exceed twenty percent opacity as a three-minute average.
	OAC rule 3745-17-08(B)	See A.I.2.b and A.I.2.c below.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the baghouse outlets associated with pellet ore rail car unloading, pellet ore transfer at the transfer station, and pellet ore screening shall not exceed twenty percent opacity as a six-minute

average.

2. **Additional Terms and Conditions**

- a. The fugitive particulate emission limitation of 7.3 tons per year includes fugitive particulate emissions from the following operations: pellet ore rail car unloading, pellet ore conveying to the ore yard stacker (3 emission points), pellet ore transfer at the transfer station, pellet ore transfer from the yard belt to the stacker boom conveyor, pellet ore yard belt conveyor loading from the reclaim hopper and unloading from conveyor belt P3 to the pellet surge bin (2 emission points), pellet ore conveying from the yard belt conveyor to the surge bin (2 emission points), pellet ore transfer including conveyor belt unloading/loading through the screening station to the surge bin (2 emission points), and pellet ore screening.
- b. Pellet ore rail car unloading, pellet ore transfer at the transfer station, and pellet ore screening operations shall be adequately enclosed and vented to baghouses. The enclosures shall be sufficient to eliminate or minimize, at all times, any visible emissions of fugitive dust from the enclosures.
- c. Pellet ore conveying to the ore yard stacker, pellet ore transfer from the yard belt transfer to the stacker boom conveyor, pellet ore yard belt conveyor loading from the reclaim hopper and unloading from conveyor belt P3 to the pellet surge bin, pellet ore conveying from the yard belt conveyor to the surge bin, and pellet ore transfer from conveyor belt unloading/loading through the screening station to the surge bin operations shall be adequately enclosed. The enclosures shall be sufficient to eliminate or minimize, at all times, any visible emissions of fugitive dust from the enclosures.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse associated with pellet ore rail car unloading shall be maintained within the range of 3 to 7 inches of water while pellet ore is being unloaded.
2. The pressure drop across the baghouse associated with pellet ore transfer at the transfer station shall be maintained within the range of 3 to 7 inches of water while pellet ore is being transferred.
3. The pressure drop across the baghouse associated with pellet ore screening shall be maintained within the range of 3 to 7 inches of water while pellet ore is being screened.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drops across the baghouses associated with pellet ore rail car unloading, pellet ore transfer at the transfer station, and pellet ore screening. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturers' recommendations, instructions, and operation manuals. The permittee shall record the pressure drops across each baghouse on a daily basis when material handling operations associated with each baghouse are occurring.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

- d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
4. The permittee shall collect and record, for each control system, the downtime of the capture (collection) system, control device, and monitoring equipment for each day the emissions unit was in operation.
 5. The permittee shall maintain records of the quantity, by weight, of all materials processed in this emissions unit during each calendar year. The records may be maintained in computerized form.

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IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drops across the baghouses associated with pellet ore rail car unloading, pellet ore transfer at the transfer station, and pellet ore screening did not comply with the allowable ranges specified above.
2. The permittee shall submit semiannual written reports which (a) identify all weeks during which any visible fugitive particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit semiannual written reports that (a) identify all weeks during which any visible particulate emissions were observed from any of the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. Testing Requirements

1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from the baghouse outlets associated with pellet ore rail car unloading, pellet ore transfer at the transfer station, and pellet ore screening shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - b. Emission Limitation:

Particulate emissions from the baghouse outlet associated with pellet ore rail car unloading shall not exceed 0.015 pound per hour and 0.063 ton per year.

Applicable Compliance Method:

 - i. If required, compliance with the hourly emission limitation shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
 - ii. The following equation shall be used to demonstrate compliance with the annual particulate emission limitation for the baghouse outlet associated with pellet ore rail car unloading:

$$PE = \text{amt. of pellets/ore processed in tons/yr} \times 0.005 \text{ lb/ton} \times 0.85 \times 0.01 \times 1 \text{ ton}/2000 \text{ lbs}$$

Where

PE = particulate emission rate (tons/yr);

amt. of pellets/ore processed in tons/yr = the total amount of pellets/ore processed in this emissions unit annually, from Section A.III.4 (tons/yr);

0.005 lb/ton = emission factor for uncontrolled pellet unloading/transfer from AP-42, Section 13.2.4, Equation 1;

0.85 = the assumed capture efficiency;

0.01 = 1 - the assumed 99% control device efficiency; and

1 ton/2000 lbs = one ton per 2000 pounds.

c. Emission Limitation:

Particulate emissions from the baghouse outlet associated with pellet ore transfer at the transfer station shall not exceed 0.016 pound per hour and 0.07 ton per year.

Applicable Compliance Method:

i. If required, compliance with the hourly emission limitation shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

ii. The following equation shall be used to demonstrate compliance with the annual particulate emission limitation for the baghouse outlet associated with pellet ore transfer at the transfer station:

$$PE = \text{amt. of pellets/ore processed in tons/yr} \times 0.005 \text{ lb/ton} \times 0.95 \times 0.01 \times 1 \text{ ton/2000 lbs}$$

Where

PE = particulate emission rate (tons/yr);

amt. of pellets/ore processed in tons/yr = the total amount of pellets/ore processed in this emissions unit annually, from Section A.III.4 (tons/yr);

0.005 lb/ton = emission factor for uncontrolled pellet unloading/transfer from AP-42, Section 13.2.4, Equation 1;

0.95 = the assumed capture efficiency;

0.01 = 1 - the assumed 99% control device efficiency; and

1 ton/2000 lbs = one ton per 2000 pounds.

d. Emission Limitation:

Particulate emissions from the baghouse outlet associated with pellet ore screening shall not exceed 0.021 pound per hour and 0.092 ton per year.

Applicable Compliance Method:

i. If required, compliance with the hourly emission limitation shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

ii. The following equation shall be used to demonstrate compliance with the annual particulate emission limitation for the baghouse outlet associated with pellet ore screening:

$$PE = \text{amt. of pellets/ore processed in tons/yr} \times 0.0065 \text{ lb/ton} \times 0.95 \times 0.01 \times 1 \text{ ton/2000 lbs}$$

Where

PE = particulate emission rate (tons/yr);

amt. of pellets/ore processed in tons/yr = the total amount of pellets/ore processed in this emissions unit annually, from Section A.III.4 (tons/yr);

0.0065 lb/ton = emission factor for uncontrolled pellet screening from AP-42, Section 13.2.4, Equation 1;

0.95 = the assumed capture efficiency;

0.01 = 1 - the assumed 99% control device efficiency; and

1 ton/2000 lbs = one ton per 2000 pounds.

e. Emission Limitation:

Fugitive particulate emissions from all operations associated with this emissions unit shall not exceed 7.3 tons per year.

Applicable Compliance Method:

The following equation shall be used to demonstrate compliance with the annual particulate emission limitation from all operations associated with this emissions unit:

$$EA = ERCU + ECOY + ETTS + ETYB + ELU + ECYB + ETCB + EPS$$

Where

EA = total annual particulate emission rate from all operations (tons/yr).

ERCU = particulate emission rate from rail car pellets/ore unloading (tons/yr), calculated using the following equation:

amt. of pellets/ore processed in tons/yr x 0.005 lb/ton x 0.15 x 0.30 x 1 ton/2000 lbs

Where

amt. of pellets/ore processed in tons/yr = the total amount of pellets/ore processed in this emissions unit annually, from Section A.III.4 (tons/yr);

0.005 lb/ton = emission factor for uncontrolled pellet unloading/transfer from AP-42, Section 13.2.4, Equation 1;

0.15 = 15% fugitive PE with 85% capture efficiency;

0.30 = 1 - the assumed 70% building/enclosure capture efficiency; and

1 ton/2000 lbs = one ton per 2000 pounds.

- e. ECOY = particulate emission rate from pellets/ore conveying to ore yard stacker (tons/yr), calculated using the following equation:

amt. of pellets/ore processed in tons/yr x 0.0011 lb/ton x 0.10 x 1 ton/2000 lbs x 3

Where

amt. of pellets/ore processed in tons/yr = the total amount of pellets/ore processed in this emissions unit annually, from Section A.III.4 (tons/yr);

0.0011 lb/ton = emission factor for uncontrolled pellet conveying from AP-42, Section 13.2.4, Equation 1;

0.10 = 1 - the assumed 90% building/enclosure capture efficiency;

1 ton/2000 lbs = one ton per 2000 pounds; and

3 = number of emission points for pellets/ore conveying to ore yard stacker.

ETTS = particulate emission rate from pellets/ore transfer at the transfer station (tons/yr), calculated using the following equation:

amt. of pellets/ore processed in tons/yr x 0.005 lb/ton x 0.05 x 0.10 x 1 ton/2000 lbs

Where

amt. of pellets/ore processed in tons/yr = the total amount of pellets/ore processed in this emissions unit annually, from Section A.III.4 (tons/yr);

0.005 lb/ton = emission factor for uncontrolled pellet unloading/transfer from AP-42, Section 13.2.4, Equation 1;

0.05 = 5% fugitive PE with 95% capture efficiency;

0.10 = 1 - the assumed 90% building/enclosure capture efficiency; and

1 ton/2000 lbs = one ton per 2000 pounds.

- e. ETYB = particulate emission rate from pellets/ore transfer from yard belt conveyor to boom conveyor (tons/yr), calculated using the following equation:

amt. of pellets/ore processed in tons/yr x 0.005 lb/ton x 0.20 x 1 ton/2000 lbs

Where

amt. of pellets/ore processed in tons/yr = the total amount of pellets/ore processed in this emissions unit annually in Section A.III.4 (tons/yr);

0.005 lb/ton = emission factor for uncontrolled pellets/ore unloading/transfer from AP-42, Section 13.2.4, Equation 1;

0.20 = 1 - the assumed 80% building/enclosure capture efficiency; and

1 ton/2000 lbs = one ton per 2000 pounds.

ELU = particulate emission rate from pellets/ore loading/unloading (tons/yr), calculated using the following equation:

amt. of pellets/ore processed in tons/yr x 0.005 lb/ton x 0.20 x 1 ton/2000 lbs x 2

Where

amt. of pellets/ore processed in tons/yr = the total amount of pellets/ore processed in this emissions unit annually, from Section A.III.4 (tons/yr);

0.005 lb/ton = emission factor for uncontrolled pellets/ore unloading/transfer from AP-42, Section 13.2.4, Equation 1;

0.20 = 1 - the assumed 80% building/enclosure capture efficiency;

1 ton/2000 lbs = one ton per 2000 pounds; and

2 = number of emission points for pellets/ore loading/unloading.

- e. ECYB = particulate emission rate from pellets/ore conveying from yard belt to surge bin (tons/yr), calculated using the following equation:

amt. of pellets/ore processed in tons/yr x 0.0011 lb/ton x 0.10 x 1 ton/2000 lbs x 2

Where

amt. of pellets/ore processed in tons/yr = the total amount of pellets/ore processed in this emissions unit annually, from Section A.III.4 (tons/yr);

0.0011 lb/ton = emission factor for uncontrolled pellets/ore conveying from AP-42, Section 13.2.4, Equation 1;

0.10 = 1 - the assumed 90% building/enclosure capture efficiency;

1 ton/2000 lbs = one ton per 2000 pounds; and

2 = number of emission points for pellets/ore conveying from yard belt to surge bin.

ETCB = particulate emission rate from pellets/ore transfer from conveyor belt unloading/loading (tons/yr), calculated using the following equation:

amt. of pellets/ore processed in tons/yr x 0.005 lb/ton x 0.10 x 1 ton/2000 lbs x 2

Where

amt. of pellets/ore processed in tons/yr = the total amount of pellets/ore processed in this emissions unit annually, from Section A.III.4 (tons/yr);

0.005 lb/ton = emission factor for uncontrolled pellets/ore unloading/transfer from AP-42, Section 13.2.4, Equation 1;

0.10 = 1 - the assumed 90% building/enclosure capture efficiency;

1 ton/2000 lbs = one ton per 2000 pounds; and

2 = number of emission points for pellets/ore transfer from conveyor belt unloading/loading.

- e. EPS = particulate emission rate from pellets/ore screening (tons/yr), calculated using the following equation:

amt. of pellets/ore processed in tons/yr x 0.0065 lb/ton x 0.05 x 0.10 x 1 ton/2000 lbs

Where

amt. of pellets/ore processed in tons/yr = the total amount of pellets/ore processed in this emissions unit annually, from Section A.III.4 (tons/yr);

0.006 lb/ton = emission factor for uncontrolled pellet unloading/transfer from AP-42, Section 13.2.4, Equation 1;

0.05 = 5% fugitive with 95% capture efficiency;

0.10 = 1 - the assumed 90% building/enclosure capture efficiency; and

1 ton/2000 lbs = one ton per 2000 pounds.

- f. Emission Limitation:

Visible fugitive particulate emissions from any enclosures associated with this emissions unit shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the modifications listed in paragraph (B)(3) (b) of OAC rule 3745-17-03.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0278000463 Emissions Unit ID: P905 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: P906 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wean Engineering, continuous galvanizing line, including acid cleaning section, equipped with a wet scrubber, and flux application and Ajax Magnothermic galvanizing kettle, equipped with a baghouse, and natural gas fired preheaters	OAC rule 3745-17-11(B)(1)	Particulate emissions from the number 2 galvanizing line shall not exceed 46.8 pounds per hour. See A.I.2.e below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average.
	40 CFR Part 63, Subpart CCC	Visible particulate emissions from the baghouse outlet shall not exceed twenty percent opacity as a six-minute average.
	OAC rule 3745-17-07(B)(1)	HCl emissions from the wet scrubber outlet from the number 2 galvanizing line shall not exceed 18 parts per million by volume (ppmv). See A.I.2.a through A.I.2.d below.
	OAC rule 3745-17-08(B)(3)	Visible fugitive particulate emissions from the number 2 galvanizing line shall not exceed twenty percent opacity as a 3-minute average from any building openings. The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from the number 2 galvanizing line zinc coating pot. See A.I.2.f below.

2. Additional Terms and Conditions

- a. The permittee shall achieve initial compliance with the requirements of 40 CFR Part 63, Subpart CCC, no later than June 22, 2001, for the acid cleaning section of the number 2 galvanizing line.
- b. If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Ohio EPA Northeast District Office may be used.
- c. The permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem with the acid cleaning section of the number 2 galvanizing line and/or the wet scrubber and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of 40 CFR Part 63, Subpart CCC.
- d. The permittee shall maintain a record of each inspection of the acid cleaning section of the number 2 galvanizing line and the wet scrubber, including each item identified in Section A.I.2.c.iv, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.
- e. The particulate emissions limitation of 46.8 pounds per hour is based upon a process weight rate of 63 tons per hour and Table I of OAC rule 3745-17-11. If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II of OAC rule 3745-17-11 is more stringent than 46.8 lbs/hour, the permittee shall comply with the more stringent limitation.
- f. The permittee shall employ reasonably available control measures that include the use of fans, and ductwork to adequately enclose, contain, and capture the particulate emissions, and vent the captured emissions to the baghouse. The collection efficiency of such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- g. The acid cleaning section of the galvanizing line shall be vented to the wet scrubber. The flux

application and Ajax Magnothermic galvanizing kettle shall be vented to the baghouse.

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II. Operational Restrictions

1. The pressure drop across the wet scrubber shall be continuously maintained at a value of not less than 2.5 inches of water at all times while the emissions unit is in operation.
2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 56 gallons per minute at all times while the emissions unit is in operation.
3. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation.
4. As required by section 63.6(e)(3) of 40 CFR Part 63, Subpart A, the permittee shall develop and implement a written startup, shutdown, and malfunction plan for the acid cleaning section of the number 2 galvanizing line that describes, in detail, procedures for operating and maintaining the emissions unit during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the 40 CFR Part 63, Subpart CCC.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each shift while the wet scrubber is operating:
 - a. the pressure drop across the wet scrubber, in inches of water;
 - b. the wet scrubber water flow rate, in gallons per minute; and
 - c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the wet scrubber while the emissions unit is in operation. The monitoring device and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall properly operate and maintain equipment to continuously monitor the water flow rate across the wet scrubber while the emissions unit is in operation. The monitoring device and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The monitoring device used to monitor the water flow rate across the wet scrubber shall be certified to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.
2. The permittee shall maintain records for the acid cleaning section of the number 2 galvanizing line and the wet scrubber for 5 years from the date of each record of:
 - a. the occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - b. the occurrence and duration of each malfunction of the air pollution control equipment;
 - c. all maintenance performed on the air pollution control equipment;
 - d. actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
 - e. all information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan;
 - f. all required measurements needed to demonstrate compliance with 40 CFR Part 63, Subpart CCC, and to support the data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;
 - g. all results of initial or subsequent performance tests;
 - h. all documentation supporting initial notifications and notifications of compliance status; and
 - i. records of any applicability determination, including supporting analyses.

3. The permittee shall prepare and implement an operation and maintenance plan for the wet scrubber. The plan must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:
 - i. require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
 - ii. require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
 - iii. require cleaning of the scrubber internals at intervals sufficient to prevent buildup of solids or other fouling; and
 - iv. require an inspection of the scrubber at intervals of no less than 3 months with:
 - (a) cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
 - (b) repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
 - (c) repair or replacement of droplet eliminator elements as needed;
 - (d) repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
 - (e) adjustment of damper settings for consistency with the required air flow.
4. In addition to the general records required in section A.III.5 of these terms and conditions, the permittee shall maintain records for the acid cleaning section of the number 2 galvanizing line and the wet scrubber for 5 years from the date of each record of:
 - a. scrubber makeup water flow rate and recirculation water flow rate;
 - b. calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and
 - c. each maintenance inspection and repair, replacement, or other corrective action.
5. The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Ohio EPA Northeast District Office for the life of the emissions unit or until the emissions unit is no longer subject to the provisions of 40 CFR Part 63, Subpart CCC. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Ohio EPA Northeast District Office for a period of 5 years after each revision to the plan.
6. All records required by sections A.III.5 and A.III.6 of these terms and conditions for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.
7. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse associated with the zinc coating pot while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
8. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, conveyors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operated under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the

following wet scrubber parameters were not maintained at or above the required levels:

- a. the static pressure drop across the wet scrubber; and
 - b. the wet scrubber water flow rate.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the baghouse associated with the zinc coating pot did not comply with the allowable range specified above.
 3. As required by section 63.10(d)(5)(i) of 40 CFR Part 63, Subpart A, the permittee shall submit the following reports:
 - a. If actions taken by the permittee during a startup, shutdown, or malfunction of the emissions unit (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.
 - b. Any time an action taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of section 63.10(d)(5)(ii) of 40 CFR Part 63, Subpart A.
 4. The permittee shall submit semiannual written reports which (a) identify all weeks during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, conveyors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emissions limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Particulate emissions from the number 2 galvanizing line shall not exceed 46.8 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03 (B)(10).
 - b. Emission Limitation:

Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - d. Emission Limitation:

Visible particulate emissions from the baghouse outlet shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 - e. Emission Limitation:

HCl emissions from the wet scrubber outlet from the number 2 galvanizing line shall not exceed 18 parts per million by volume (ppmv).

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.

- f. Emission Limitation:
- Visible particulate emissions from the number 2 galvanizing line shall not exceed twenty percent opacity as a 3-minute average from any building openings.
- Applicable Compliance Method:
- If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted every 2.5 years in accordance with 40 CFR Part 63, Subpart CCC.
 - The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for HCl.
 - The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and 26A of 40 CFR Part 60, Appendix A.
 - The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted within 6 months of the effective date of this permit.
 - The emission testing shall be conducted at the outlets of the scrubber and baghouse to demonstrate compliance with the allowable mass emission limitation for particulates.
 - A particulate emissions test also shall be conducted at the inlet of the scrubber to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. A particulate emissions test also may be conducted at the inlet of the baghouse to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11, or the facility may use the previously established uncontrolled mass rate of emission of 85.25 lbs/hr.
 - The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and 5 and/or 26A of 40 CFR Part 60, Appendix A.
 - The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date (s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
- Personnel from the Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

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VI. **Miscellaneous Requirements**

- None

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Facility ID: 0278000463 Emissions Unit ID: P906 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0278000463 Emissions Unit ID: R001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Roll shop maintenance cold cleaner utilizing mineral spirits or a comparable solvent	OAC rule 3745-21-09(O)(2)	See Section II. Operational Restrictions.
2. Additional Terms and Conditions		
(a) None		

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II. **Operational Restrictions**

1. The permittee shall equip the cold cleaner with either:
 - a. a cover; and if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute measured at one hundred degrees Fahrenheit, or the solvent is heated or agitated, the cover shall be designed and constructed so that it can be easily operated with one hand; or
 - b. a remote solvent reservoir from which solvent is pumped through a nozzle suspended over a sink-like work area which drains back to the reservoir, provided the sink-like work area has an open drain area of less than sixteen square inches and provided the solvent neither is heated above one hundred degrees Fahrenheit nor has a vapor pressure greater than 0.6 pound per square inch absolute, measured at one hundred degrees Fahrenheit.
2. The permittee shall equip the cold cleaner with a device for draining the cleaned parts; and if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute, measured at one hundred degrees Fahrenheit, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining unless an internal type drainage device cannot fit into the cleaning system.
3. The permittee shall install one of the following devices if the solvent vapor pressure is greater than 0.6 pound per square inch absolute measured at one hundred degrees Fahrenheit, or if the solvent is heated above one hundred twenty degrees Fahrenheit:
 - a. freeboard that gives a freeboard ratio greater than or equal to 0.7;
 - b. water cover (solvent must be insoluble in and heavier than water); or
 - c. other systems of equivalent control, such as refrigerated chiller or carbon adsorption, approved by the Ohio EPA Northeast District Office.
4. The permittee shall operate and maintain the cold cleaner in accordance with the following practices to minimize solvent evaporation from the unit:
 - a. provide a permanent, legible, conspicuous label, summarizing the operating requirements;
 - b. store waste solvent in covered containers;
 - c. close the cover whenever parts are not being handled in the cleaner;
 - d. drain the cleaned parts until dripping ceases;
 - e. if used, supply a solvent spray that is a solid fluid stream (not a fine, atomized, or shower-type spray) at a pressure that does not exceed ten pounds per square inch gauge; and
 - f. clean only materials that are neither porous nor absorbent.
5. The permittee shall not employ halogenated solvents identified in 40 CFR Part 63, Subpart T, in this emissions unit.

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III. **Monitoring and/or Record Keeping Requirements**

1. Any owner or operator of a solvent metal cleaning operation shall maintain records of the following information in a readily accessible location for at least five years and shall make these records available to the Director upon verbal or written request:
 - a. all control equipment maintenance such as replacement of the carbon in a carbon adsorption unit;
 - b. for cold cleaners, the types of solvents employed, whether or not each solvent is a hazardous air

pollutant, and the vapor pressure of each solvent (pounds per square inch absolute) measured at one hundred degrees Fahrenheit; and

c. the results of all emissions tests conducted, if required, to demonstrate compliance with the terms and conditions of this permit.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a solvent that is a hazardous air pollutant was employed in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0278000463 Emissions Unit ID: R001 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2. Additional Terms and Conditions			
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None