

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install 06-07719

A. Source Description

The source is a 1340 HP diesel fired engine which will run a water pump during power outages. The pump is normally powered by an electric motor.

B. Facility Emissions and Attainment Status

Wheeling-Pittsburgh Steel is a major stationary source located in Jefferson County, which is non-attainment for ozone (8-hour standard) and recommended to be non-attainment for PM2.5.

C. Source Emissions

This engine has a potential to emit of 64.6 TPY of NO_x which would trigger PSD review. All other pollutants are well below significance levels. The applicant has requested an operation limit of 500 hours during any 12-month period. This will limit emissions of NO_x to 3.7 TPY.

D. Conclusion

This permit contains federally enforceable limits with adequate monitoring, recordkeeping and reporting requirements to assure that emissions will not exceed PSD significance levels.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: DRAFT PERMIT TO INSTALL

JEFFERSON COUNTY

Application No: 06-07719

Fac ID: 0641090010

CERTIFIED MAIL

| | |
|------|------------------------------|
| | TOXIC REVIEW |
| | PSD |
| Y | SYNTHETIC MINOR |
| | CEMS |
| ZZZZ | MACT |
| | NSPS |
| | NESHAPS |
| | NETTING |
| | MAJOR NON-ATTAINMENT |
| | MODELING SUBMITTED |
| | GASOLINE DISPENSING FACILITY |

DATE: 2/17/2005

Wheeling Pittsburgh Steel Corporation
Don Keaton
1134 Market St
Wheeling, WV 26003

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

JEFFERSON COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07719 FOR AN AIR CONTAMINANT SOURCE FOR
Wheeling Pittsburgh Steel Corporation**

On 2/17/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Wheeling Pittsburgh Steel Corporation**, located at **S Third St, Steubenville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07719:

Backup diesel driven water pump.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Kay Gilmer, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 06-07719

Application Number: 06-07719
Facility ID: 0641090010
Permit Fee: **To be entered upon final issuance**
Name of Facility: Wheeling Pittsburgh Steel Corporation
Person to Contact: Don Keaton
Address: 1134 Market St
Wheeling, WV 26003

Location of proposed air contaminant source(s) [emissions unit(s)]:
**S Third St
Steubenville, Ohio**

Description of proposed emissions unit(s):
Backup diesel driven water pump.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the

previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or

condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. **Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. **Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|---------------------|----------------------|
| PM/PM ₁₀ | 0.1 |
| NO _x | 3.7 |
| CO | 0.4 |
| SO _x | 0.6 |
| OC | 0.2 |

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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> |
|---|--------------------------------------|--|
| P115 - 1340 HP diesel engine | OAC rule 3745-31-05(A)(3) | Emissions shall not exceed: 2.30 pounds per hour (lbs/hr) of sulfur dioxide (SO ₂); 14.74 lbs/hr of nitrogen oxides (NO _x); 0.65 lb/hr of volatile organic compounds (VOC); and 1.44 lbs/hr of carbon monoxide (CO). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-11(B)(5)(b) and 3745-17-07(A). |
| | OAC rule 3745-31-05(C) | Emissions shall not exceed, as a rolling 12-month summation: 0.6 tons SO ₂ 3.7 tons NO _x 0.2 ton VOC 0.4 tons CO 0.2 ton particulate emissions (PE) |
| | OAC rule 3745-17-11(B)(5)(b) | See Section II.2 below. Emissions shall not exceed 0.35 lb PE/million Btu of actual heat input. See Section I.2.a below. |

| | |
|------------------------------|---|
| OAC rule 3745-17-07(A)(1) | Emissions shall not exceed 0.062 lb PE/million Btu of actual heat input. See Section I.2.b below. |
| OAC rule 3745-18-06(G) | Visible emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule. |
| OAC rule 3745-23-06(B) | Exempt. See Section I.2.c below. |
| 40 CFR Part 63, Subpart ZZZZ | See Section I.2.d below. |
| | Exempt. See Section I.2.e below. |

2. Additional Terms and Conditions

- 2.a** The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.062 lb/million Btu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.b** This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.
- 2.c** This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).
- 2.d** The permittee has satisfied the "latest available control techniques and operating practices required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.
- 2.e** This emissions unit is a new or reconstructed emergency stationary RICE. Therefore, the unit does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of 40 CFR 63.6645(d).

II. Operational Restrictions

- 1. The permittee shall only burn low sulfur No. 2 or diesel fuel, containing less than 0.5% sulfur by weight, in this emissions unit.
- 2. The maximum number of operating hours for emissions unit P115 shall not exceed 500 hours as a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

Maximum Cumulative

Wheeling Pittsburgh Steel Corporation
PTI Application: 06-07719
Issued: To be entered upon final issuance

Facility ID: 0641090010
Emissions Unit ID: P115

| <u>Month(s)</u> | <u>Operating Hours</u> |
|-----------------|------------------------|
| 1-1 | 300 |
| 1-2 | 500 |
| 1-3 | 500 |
| 1-4 | 500 |
| 1-5 | 500 |
| 1-6 | 500 |
| 1-7 | 500 |
| 1-8 | 500 |
| 1-9 | 500 |
| 1-10 | 500 |
| 1-11 | 500 |
| 1-12 | 500 |

After the first 12 calendar months of operation following the startup of emissions unit P115, compliance with the annual operating hours limitation shall be based upon a rolling 12-month summation of the operating hours.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain documentation on the sulfur content of all fuels received.
2. For each day during which the permittee burns a fuel other than low sulfur No. 2 or diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall maintain monthly records of the following information:
 - a. the hours of operation for P115 for each month;
 - b. during the first 12 calendar months of operation following the issuance of this permit, the cumulative hours of operation, calculated by adding the current month's operating hours to the operating hours for each calendar month since the issuance of this permit; and
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the hours of operation, calculated by adding the current month's operating hours to the operating hours for the preceding eleven calendar months.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than low sulfur No. 2 or diesel fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation;
 - b. any exceedance of the rolling 12-month hours of operation limitation; and
 - c. any exceedance of the sulfur content fuel restriction specified in Section II.1.

These deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

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

- a. **Emissions Limitation:**
Emissions shall not exceed 2.30 lbs/hr SO₂.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the emission factor from the manufacturer (0.001709 lb/HP-hr) by the maximum rated capacity of P115 (1340 HP).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

- b. **Emissions Limitation:**
Emissions shall not exceed 0.6 tons SO₂ as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly SO₂ emission rate by the total number of hours operated per twelve month rolling period, as recorded in Section III.3.c, and dividing by 2000 lbs/ton.

- c. **Emissions Limitation:**
Emissions shall not exceed 14.74 lbs/hr NO_x.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the emission factor from the manufacturer (0.011 lb/HP-hr) by the maximum rated capacity of P115 (1340 HP).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.

- d. Emissions Limitation:
Emissions shall not exceed 3.7 tons NO_x as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly NO_x emission rate by the total number of hours operated per twelve month rolling period, as recorded in Section III.3.c, and dividing by 2000 lbs/ton.

- e. Emissions Limitation:
Emissions shall not exceed 0.65 lb/hr VOC.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the emission factor from the manufacturer (0.00048 lb/HP-hr) by the maximum rated capacity of P115 (1340 HP).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 25A of 40 CFR Part 60, Appendix A.

- f. Emissions Limitation:
Emissions shall not exceed 0.2 ton VOC as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly VOC emission rate by the total number of hours operated per twelve month rolling period, as recorded in Section III.3.c, and dividing by 2000 lbs/ton.

- g. Emissions Limitation:
Emissions shall not exceed 1.44 lbs/hr CO.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor from the manufacturer (0.001068 lb/HP-hr) by the maximum rated capacity of P115 (1340 HP).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

- h. Emissions Limitation:
Emissions shall not exceed 0.4 tons CO as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly CO emission rate by the total number of hours operated per twelve month rolling period, as recorded in Section III.3.c, and dividing by 2000 lbs/ton.

- i. Emissions Limitation:
0.35 lb PE/million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor of 0.062 lb/million Btu specified in AP-42, Table 3.4-2, 10/1996. Note that Ohio EPA has revised the emission limitation specified in OAC rule 3745-17-11(B)(5)(b) based upon the currently applicable emission factor. The revised rule was adopted by the Director of Ohio EPA in December of 1997, and it will be submitted to the U.S. EPA as a proposed revision to the Ohio SIP for particulate matter. When the SIP revision is approved by the U.S. EPA, the 0.35 lb/million Btu actual heat input emission limitation will no longer be applicable.

- j. Emissions Limitation:
0.062 lb PE/million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be determined based on the emission factor of 0.062 lb/million Btu specified in AP-42, Table 3.4-2, 10/1996.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

- k. Emissions Limitation:
Emissions shall not exceed 0.2 ton PE as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by multiplying the PE emission limitation of 0.062 lb/million Btu of actual heat input by the maximum heat input of P115 (9.06 million Btu/hr) and by the total number of hours operated per twelve month rolling period, as recorded in Section III.3.c, and dividing by 2000 lbs/ton.

- l. Emissions Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Method 9 of 40 CFR Part 60, Appendix A.

- 2. Compliance with the operational restrictions in Section B of these terms and conditions shall be determined in accordance with the following methods:

- a. Operational Limitation:
The permittee shall only burn low sulfur No. 2 or diesel fuel, containing less than 0.5% sulfur by weight, in this emissions unit.

Wheeling Pittsburgh Steel Corporation

PTI Application: 06-07719

Issued: To be entered upon final issuance

Facility ID: 0641090010

Emissions Unit ID: P115

Applicable Compliance Method:

Compliance shall be based on recordkeeping as specified in Sections III.1 and III.2 of this permit.

b. Operational Limitation:

The maximum number of operating hours for emissions unit P115 shall not exceed 500 hours as a rolling 12-month summation

Applicable Compliance Method:

Compliance shall be based on recordkeeping as specified in Section III.3 of this permit.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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> |
|---|--------------------------------------|--|
| P115 - 1340 HP diesel engine | None | None |

2. **Additional Terms and Conditions**

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA’s “Air Toxic Policy” was not necessary because the emissions unit’s maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.