



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL

CUYAHOGA COUNTY

Application No: 13-01915

Fac ID: 1318001613

DATE: 9/13/2005

ISG Cleveland, Incorporated
Richard Zavoda
3060 Eggers Avenue
Cleveland, OH 44105

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 500** 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.

Very truly yours,

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

CC: USEPA

CLAA

PA

**CUYAHOGA
COUNTY**

**PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 13-01915 FOR AN AIR CONTAMINANT SOURCE FOR
ISG Cleveland, Incorporated**

On 9/13/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **ISG Cleveland, Incorporated**, located at **3060 Eggers Avenue, Cleveland, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-01915:

Administrative Modification to change the maximum physical capacity of emissions unit P071 from 173 mmBtu/hr to 159 mmBtu/hr.

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.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue,
Cleveland, OH 44114 [(216)664-2324]



**Permit To Install
Terms and Conditions**

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

DRAFT MODIFICATION OF PERMIT TO INSTALL 13-01915

Application Number: **13-01915**
APS Premise Number: **1318001613**
Permit Fee: **\$ To be entered upon final issuance**
Name of Facility: **ISG Cleveland, Incorporated**
Person to Contact: **Richard Zavoda**
Address: **3060 Eggers Avenue
Cleveland, OH 44105**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3060 Eggers Avenue
Cleveland, OHIO**

Description of modification:
159 mmBtu/hr MAX Heat Input Natural Gas Fired hot dip Galvanizing Line Anneal Furnace.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

ISG Cleveland, Incorporated

PTI Application: 13-01915

Modification Issued: To be entered upon final issuance

Facility ID: **1318001613**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

ISG Cleveland, Incorporated

PTI Application: 13-01915

Modification Issued: To be entered upon final issuance

Facility ID: **1318001613**

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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).

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.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

6

ISG Cleveland, Incorporated

PTI Application: 13-01915

Modification Issued: To be entered upon final issuance

Facility ID: **1318001613**

ISG Cleveland, Incorporated

Facility ID: 1318001613

PTI Application: 13-01915

Modification Issued: To be entered upon final issuance

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
-------------------------------	-------------------------------------	--------------------------	-------------------------------------------	--------------------------------------------------------------------------

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **ISG Cleveland, Incorporated** located in **CUYAHOGA** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	
P071	159 mmBtu/hr Natural gas-fired Hot Dip Galvanizing line anneal furnace		OAC rule 3745-17-07(A)(1)	OAC rule 3745-18-06
	Modification supercedes PTI 13-01915 issued on March 15, 1989.		OAC rule 3745-17-11 OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-08 OAC rule 3745-23-06 40 CFR 63, Subpart DDDDD.

ISG Cleveland, Incorporated

Facility ID: 1318001613

PTI Application: 13-01915

Modification Issued: To be entered upon final issuance

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	C)	CFR 63, Subpart DDDDD.		
Permit Allowable Mass Emissions and/or Control/Usage Requirements	0.02 lb particulate emissions (PE)/mmBtu actual heat input See Footnote D			
Exempt (See Footnote A)	The requirements of this rule include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, 3745-21-08, and 3745-23-06.			
Exempt (See Footnote A)	The requirements of this rule are less stringent than the requirements pursuant to OAC rule 3745-31-05(A)(3).			
0.23 lb of nitrogen oxides emissions per mmBtu actual heat input (See Footnote A)	See Footnote B			
	See Footnote B			
	See Title V permit for the requirements of 40			

- 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.

This emissions unit is exempt from the visible particulate 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.

- B. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install # 13-1915. On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

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 Permit to Install # 13-1915.

- C. The NO_x emission limit was established by multiplying 1.2 times the 1994 stack test emission rate of 0.191 lb/MMBTU.
- D. Burning only natural gas at 159 MMBTU/hr (max. Heat input), particulate emissions are limited to a maximum of 0.02 lb/MMBTU, nitrogen oxides emissions are limited to 0.23 lb/MMBTU physical maximum capacity is 159 MMBTU/hr due to physical removal of burners.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

CO

Pollutant

TSP

SO₂

NO_x (net reduction)

ISG Cleveland, Incorporated
PTI Application: 13-01915
Modification Issued: To be entered upon final issuance

Facility ID: 1318001613

Tons/Year

5.22
0.41
160.2 (net decrease 84.5)
27.16

This condition in no way limits the applicability of any other state or federal regulation.

APPLICABILITY

This Permit to Install is applicable only to the air contaminant sources listed and does not include the installation or modification of wastewater disposal systems or solid waste disposal facilities. Separate application must be made to the Director for the installation or modification of any such wastewater disposal systems or solid waste disposal facilities.

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutant(s):

Nitrogen oxides as determined by Federal Reference Method #7.

Note: Test was completed in 1994. Future emissions testing required by Title V Permit.

ISG Cleveland, Incorporated
PTI Application: 13-01915
Modification Issued: To be entered upon final issuance

Facility ID: **1318001613**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

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.

MALFUNCTION/ABATEMENT

This source and its associated air pollution control system (s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Upon startup of the new continuous annealing line, the permittee shall permanently cease operation of the existing gas-fired box annealing furnace (1318001613 P053). Two mixed fuel boilers (1318000078 B002 & B003) shall also be permanently removed from service.
2. The actual annual emissions of nitrogen oxides from the existing sources are 129.5 tons per year (P053) and 115.2 tons per year (B002 & B003) for a total of 244.7 tons per year. The emissions from the new continuous annealing line shall not exceed 0.23 lb NO_x/MMBTU and 160.2 tons per year. This results in a net emission decrease of 84.5 tons per year of nitrogen oxides.