John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

2/5/2014

Certified Mail

Mr. Nathan Berry
NorthStar Bluescope Steel, LLC
6767 county road 9
Delta, OH 43515

Facility ID: 0326000073
Permit Number: P0107665
County: Fulton

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Fulton County Expositor. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NWDO; Michigan; Indiana

PUBLIC NOTICE
2/5/2014 Issuance of Draft Air Pollution Title V Permit

NorthStar Bluescope Steel, LLC
6767 County Road 9,
Delta, OH 43515
Fulton County
FACILITY DESC.: Iron and Steel Mills
PERMIT #: P0107665
PERMIT TYPE: Renewal
PERMIT DESC: Renewal Title V operating permit for a steel mill with 315 TPH Electric Arc Furnace (EAF) and two Ladle Metallurgy Furnaces (LMFs) and other ancillary equipment.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461

DRAFT

Division of Air Pollution Control
Title V Permit
for
NorthStar Bluescope Steel, LLC

Facility ID:	0326000073
Permit Number:	P0107665
Permit Type:	Renewal
Issued:	2/5/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
NorthStar Bluescope Steel, LLC

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Authorization

Facility ID: 0326000073
Facility Description: Steel Mill.
Application Number(s): A0037512, M0000549, A0041077
Permit Number: P0107665
Permit Description: Renewal Title V operating permit for a steel mill with 315 TPH Electric Arc Furnace (EAF) and two Ladle Metallurgy Furnaces (LMFs) and other ancillary equipment.
Permit Type: Renewal
Issue Date: 2/5/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0086998

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

NorthStar Bluescope Steel, LLC
6767 County Road 9
Delta, OH 43515

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Interim Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) 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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. 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.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:

(1) 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.

(2) 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 paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) 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 Ohio EPA DAPC, Northwest District Office 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an

additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved a compliance assurance monitoring (CAM) plant for emissions units P901, P902, and P903 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

   [40 CFR Part 64]

3. The following insignificant emissions units are located at this facility is subject to all applicable requirements as outlined in OAC rule 3745-31-03(A)(4)(b):

EU ID	Operations, Property and/or Equipment Description
P107	1145hp diesel fired emergency generator

   [OAC rule 3745-77-07(A)(13)]

4. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-31, 3745-17, and 40 CFR Part 60 Subpart AAa:

EU ID	Operations, Property and/or Equipment Description
F001	EAF Dust Handling System.
F002	Limestone and Carbon Silos (Eastside).
F003	Limestone and Carbon Silos (Westside).
P010	Tundish Preheater #1.
P011	Tundish Preheater #2.
P012	Tundish Dryer #1.
P904	Continuous Caster.
P101	LMF Lime Silo
P102	Limestone Receiving
P103	Ladle Temp and Al station
P104	Liquid steel decanting
P105	Ladle rebuild area
P106	Tundish de-skull stand

   [OAC rule 3745-77-07(C)(1), 40 CFR, Part 60, Subpart AAa, and PTI 03-09212]

C. Emissions Unit Terms and Conditions

1. F005, Plant Roadways & Parking Areas

Operations, Property and/or Equipment Description:

Plant Roadways and Parking Areas.

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
paved roadways and parking areas		
a.	OAC rule 3745-31-05 (PTI 03-09212, 01/09/03)	There shall be no visible emissions of fugitive dust, except for a period of 1 minute during any 60-minute period [see b)(2)c.].
unpaved roadways and parking areas		
b.	OAC rule 3745-31-05 (PTI 03-09212, 01/09/03)	There shall be no visible emissions of fugitive dust, except for a period of 3 minutes during any 60-minute period [see b)(2)d.].
paved and unpaved roadways and parking areas		
c.	OAC rule 3745-31-05 (PTI 03-09212, 01/09/03)	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust [See b)(2)e. through b)(2)k.] 213.8 lbs particulate emissions (PE)/day (average) 42.8 lbs particulate matter less than 10 microns (PM10)/day(average) See b)(2)l.
d.	OAC rule 3745-17-07(B)(1)	See b)(2)a.
e.	OAC rule 3745-17-08 (B)	See b)(2)b.

(2) Additional Terms and Conditions

a. This emission unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c. The paved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

i. paved roadways: main site entrance road employee entrance road scrap and coil roads warehouse, central maintenance and roll shop road north - south connection road

ii. paved parking/storage areas: main parking lot coil storage area scrap storage area building storage pads

d. The unpaved roadways and parking areas that are covered by this permit and subject to the above-mentioned requirements are listed below:

i. unpaved roadways: slag transport road south service road

ii. unpaved parking/storage areas: north coil storage yard south coil storage yard

e. The permittee shall employ best available control measures on all paved roadways, parking and storage 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, parking and storage areas by flushing with water and/or sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally effective control measures to ensure compliance.

f. The permittee shall employ best available control measures on all unpaved roadways and storage 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 with water and unpaved storage areas with water and/or dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other equally effective control measures to ensure compliance.

g. 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.

h. 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.

i. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved public streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

j. Open-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.

k. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

l. The PE and PM10 emission limitations were established as average daily values [based on the annual vehicle miles traveled (VMT) divided by 365 days]. It is also assumed that 20% of the PE are PM10.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

a. paved roadways: minimum inspection frequency main site entrance road daily employee entrance road daily scrap and coil roads daily warehouse, central maintenance daily and roll shop road north - south connection road daily

b. paved parking/storage areas: minimum inspection frequency main parking lot daily coil storage area daily scrap storage area daily building storage pads daily

c. unpaved roadways: minimum inspection frequency slag transport road daily south service road daily

d. unpaved storage areas: minimum inspection frequency north coil storage yard daily south coil storage yard daily

[OAC rule 3745-77-07(C)(1)]

(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. 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.

[OAC rule 3745-77-07(C)(1)]

(3) 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.

(4) The information required in d)(3)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.

[OAC rule 3745-77-07(C)(1)]

e) 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.

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

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

213.8 lbs PE/day (average)

Applicable Compliance Method:

The limitation of 213.8 lbs PE/day may be determined based on the emission factors for paved and unpaved roadways and parking areas utilizing AP-42, Section 13.2.1 (paved roads)(revised 1997) and section 13.2.2 (unpaved roads)(revised 1998) and the average daily VMT (maximum VMT/365).

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

42.8 lbs PM10/day

Applicable Compliance Method:

The limitation of 42.8 lbs PM10/day may be determined by multiplying the daily PE limitation by 0.2.*

* PM10 emissions are assumed to be 20% of the total PE.

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

There shall be no visible emissions of fugitive dust from any paved roadway, except for a period of 1 minute during any 60-minute period.

There shall be no visible emissions of fugitive dust from any unpaved roadway, except for a period of 3 minutes during any 60-minute period.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitations in accordance with Method 22 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. P001, Tunnel Furnace

Operations, Property and/or Equipment Description:

Tunnel Furnace

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (PTI 03-09212, 01/09/03)	1.13 lbs particulate emissions (PE) /hr and 4.95 tons PE/yr 0.068 lb sulfur dioxide (SO2)/hr and 0.30 ton SO2/yr 22.6 lbs nitrogen oxides (NOx)/hr and 99.0 tons NOx/yr 7.91 lbs carbon monoxide (CO)/hr and 34.7 tons CO/yr 0.32 lb organic compounds (OC)/hr and 1.39 tons/yr The requirements of this rule also include compliance with the requirements of OAC rule 3745-3745-17-07(A).
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-18-06(E)	See b)(2)a.

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI 03- 09212]

d) 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.

[OAC rule 3745-77-07(C)(1)]

e) 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.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

22.6 lbs NOx/hr and 99.0 tons NOx/yr

<u>Applicable Compliance Methods:</u>

The permittee may demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) by a permittee supplied emission factor of 200 lbs NOx/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

If required the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

7.91 lb CO/hr and 34.7 tons CO/yr

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) by a permittee supplied emission factor of 70 lbs CO/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation in accordance with Methods 1 through 4 and 10, of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

1.13 lb PE/hr and 4.95 tons PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with lbs PE/hr limitation above by multiplying a permittee supplied emission factor of 10 lbs PE/mmcu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft./hr).

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordant by using test Methods 1 through 5, which are located in 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

0.068 lb SO2/hr and 0.030 ton SO2/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with lb SO2/hr limitation above by multiplying an emission factor from AP-42, Table 1.4-2 (revised 7/98) of 0.6 lb SO2/mmcu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr).

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation by using test Methods 1 - 4 and 6, which are located in 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

e. Emission Limitations:

0.32 lb OC/hr and 1.39 tons OC/yr

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) by a permittee supplied emission factor of 2.8 lbs OC/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 1 through 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

3. P002, Heated Transfer Table

Operations, Property and/or Equipment Description:

Heat transfer table

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (PTI 03-09212, 01/09/03)	0.60 lbs particulate emissions (PE) /hr and 2.63 tons PE/yr 0.036 lb sulfur dioxide (SO2)/hr and 0.16 ton SO2/yr 9.0 lbs nitrogen oxides (NOx)/hr and 39.5 tons NOx/yr 4.20 lbs carbon monoxide (CO)/hr and 18.4 tons CO/yr 0.17 lb organic compounds (OC)/hr and 0.74 tons/yr The requirements of this rule also include compliance with the requirements of OAC rule 3745-3745-17-07(A).
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-18-06(E)	See b)(2)a.

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI 03- 09212]

d) 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.

[OAC rule 3745-77-07(A)(1)]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

9.0 lbs NOx/hr and 39.5 tons NOx/yr

<u>Applicable Compliance Methods:</u>

The permittee may demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) by a permittee supplied emission factor of 200 lbs NOx/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

4.20 lb CO/hr and 18.4 tons CO/yr

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) by a permittee supplied emission factor of 70 lbs CO/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation in accordance with Methods 1 through 4 and 10, of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.60 lb PE/hr and 2.63 tons PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with lbs PE/hr limitation above by multiplying a permittee supplied emission factor of 10 lbs PE/mmcu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft./hr).

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation by using test Methods 1 through 5, which are located in 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

0.036 lb SO2/hr and 0.16 ton SO2/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with lb SO2/hr limitation above by multiplying an emission factor from AP-42, Table 1.4-2 (revised 7/98) of 0.6 lb SO2/mmcu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr).

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation by using test Methods 1 - 4 and 6, which are located in 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

e. Emission Limitations:

0.17 lb OC/hr and 0.74 ton OC/yr

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) by a permittee supplied emission factor of 2.8 lbs OC/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 1 through 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

f. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. P003, Finishing Mill

Operations, Property and/or Equipment Description:

Finish Mill (hot rolling mill).

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (PTI 03-09212, issued 01/09/03)	2.2 lbs particulate emissions (PE) /hr The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) The permittee shall not employ any rolling mill solution and/or any oils that result in the emissions of organic compounds.

[OAC rule 3745-77-07(A)(1) and PTI 03-09212]

d) Monitoring and/or Recordkeeping 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 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.

[OAC rule 3745-77-07(C)(1)]

(2) The permittee shall record and maintain the following information for this emissions unit:

a. the name or identification number of each rolling mill solution and oil employed;

b. the OC content, in lbs/gallon, and the boiling point, in degrees Fahrenheit, of each rolling mill solution and oil employed; and

c. whether or not each rolling mill solution or oil employed resulted in the emissions of organic compounds.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible particulate emissions were observed from this emissions unit; and

b. any corrective actions taken to eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

2.2 lbs PE/hr

<u>Applicable Compliance Method:</u>

The permittee may demonstrate compliance with the lbs PE/hr allowable limitation above by multiplying an emission factor based on vendor estimates of 10 milligrams/cu. meter by the maximum exhaust fume flow rate (cu. meters/hr), and then dividing by 454,100*.

* milligrams to pounds conversion factor

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

5. P014, Contact Cooling Towers

Operations, Property and/or Equipment Description:

Cooling Tower

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (PTI 03-09212, issued 01/09/03)	2.91 lbs particulate emissions (PE) /hr The requirements of this rule also includesthe use of high efficiency mist eliminatorsto control PE from this emissions unit andcompliance with the requirements of OAC rule 3745-17-07(A).
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping 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 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.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

a. all days during which any visible particulate emissions were observed from 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 Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)1 of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

2.91 lbs PE/hr

<u>Applicable Compliance Method:</u>

The permittee may demonstrate compliance with the hourly allowable PE limitation above by multiplying the emission factors contained in AP-42 [Chapter 13, Section 13.4 (revised 7/94) for Wet Cooling Towers] by the water circulation rate (in gallons per minute) from the meltshop, caster contact and noncontact, mill contact and noncontact, and laminar flow, and then multiplying by 60.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

6. P015, Cooling Tower #7

Operations, Property and/or Equipment Description:

Cooling tower

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (PTI 03-17004, issued 12/20/05)	0.50 lbs particulate emissions (PE) /hr and 2.2 tons PE/yr The requirements of this rule also includes compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-31-10 through OAC rule 3745-31-20.
b.	OAC rule 3745-31-10 through OAC rule 3745-31-20	See b)(2)a.
c..	OAC rule 3745-17-11(B)	See b)(2)b.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The permittee shall employ Best Available Control Technology (BACT) for controlling PE/PM10 on this emissions unit. The BACT requirements for this emissions unit has been determined to be use of high efficiency drift eliminators.

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) The permittee shall not exceed an average total dissolved solids content of 1,000 parts per million (ppm) in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI 03-17004]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform the following monitoring requirements for emissions unit P015 on a weekly basis:

a. test and record the total dissolved solids content, in ppm*; and,

b. if monitored on a greater frequency, determine the average dissolved solids content, in ppm on a weekly basis.

* The permittee may measure conductivity in lieu of a direct measurement for dissolved solids content.

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports in that identify all exceedances of the average total dissolved solids content of 1000 ppm.

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

0.50 lbs PE/hr & 2.2 tons PE/yr

<u>Applicable Compliance Method</u>:

The lbs/hr emission limitation shall was established by applying the maximum drift loss factor 0.005 percent to the maximum average total dissolved solids content of 1,000 ppm and a maximum flow rate of 1,200,000 gallons per hour for the cooling water. Therefore, provided the permittee demonstrates compliance with the average dissolved solids content, compliance with the hourly emission limitation shall be demonstrated.

If required, the permittee shall submit a testing proposal which will demonstrate that the maximum drift loss does not exceed 0.005 percent.

Compliance with the annual emission limitation shall be demonstrated by the multiplying the hourly emission rate by the maximum operating schedule of 8760 hrs/yr, and by the conversion factor of 2000 lbs/ton. Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation

[OAC rule 3745-77-07(C)(1) and PTI03-17004]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

g) Miscellaneous Requirements

(1) None.

7. P016 -Ladle Preheater No 4,

Operations, Property and/or Equipment Description:

Ladle Preheater No 4

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3), as effective 11/30/01 (PTI P0116009 issued 12/24/13)	2.0 lbs nitrogen oxide (NOx)/hr and 8.76 tons NOx/yr, 0.40 lbs carbon monoxide (CO)/hr and 1.75 tons CO/yr, 0.06 lbs, particulate matter 10 microns or less in size (PM10)/hr and 0.26 ton PM10/yr 0.11 lbs volatile organic compound (VOC)/hr and 0.48 ton VOC/yr 0.01 lb sulfur dioxide (SO2)/hr and 0.05 ton SO2/yr See b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05 (A)(3), as effective 12/1/06	See b)(2)c.
c.	OAC rule 3745-17-11(B)	See b)(2)d.
d.	OAC rule 3745-17-07(A)	See b)(2)e.
e.	OAC rule 3745-18-06	See b)(2)f.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements established under OAC rule 3745-31-05(A)(3), as effective November 30, 2001, have been determined to be compliance with the terms and conditions of this permit.

b. The permittee has satisfied the BAT requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective 11/30/01, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 Changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then the requirements of OAC rule 3745-31-05(A)(3), effective November 30, 2001 will no longer apply.

c. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the emissions of NOx, CO, PE/PM10, VOC, and SO2 from this air contaminant source since the uncontrolled potential to emit is less than ten tons per year for each pollutant (8.76 tons/yr for NOx, 1.75 tons/yr for CO, 0.26 ton/yr for PE/PM10, 0.48 ton/yr for OC, and 0.05 ton/yr for SO2 respectively).

d. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Fulton county.

e. These emissions units are exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

f. The emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI P0116009]

d) 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.

[OAC rule 3745-77-07(C)(1) and PTI P0116009]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in these emissions units. The deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI P0116009]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:
2.0 lbs NOx/hr and 8.76 tons NOx/yr,
0.40 lb CO/hr and 1.75 tons CO/yr,
0.06 lb PM10/hr and 0.26 ton PM10/yr
0.11 lb VOC/hr and 0.48 ton VOC/yr
0.01 lb SO2/hr and 0.05 ton SO2/yr

Applicable Compliance Method:
The hourly emissions limitations represent the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

If required, the permittee shall demonstrate compliance with the hourly emission limitations by testing in accordance with the following for each pollutant:

NOx: Methods 1-4 and 7 of 40 CFR Part 60, Subpart A;
CO: Methods 1-4 and 10 of 40 CFR Part 60, Subpart A;
PM10: Methods 1-4 of 40 CFR Part 60, Subpart A and Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M
VOC: Methods 1-4 and 18, 25 or 25A,as appropriate, of 40 CFR Part 60, Subpart A; and
SO2: Methods 1-4 and 6 of 40 CFR Part 60, Subpart A.

*The potential to emit for NOx, OC, and SO2 was determined by multiplying the appropriate emission factor from AP-42 {(Section 1.4, Table 1.4-1, 7/98), 100 lbs NOx/10^6scf, 5.5 lbs OC/10^6scf, and 0.6 lbs S02/10^6scf of natural gas respectively}, by the maximum fuel flow rate of 20,000 scf of natural gas/hr.

*The potential to emit for CO and PE/PM10 determined by multiplying the appropriate vendor supplied emission factor (20 lbs CO/10^6scf, and 3.0 lbs PE/PM10/10^6scf of natural gas respectively) by the maximum fuel flow rate of 20,000 scf of natural gas/hr.

The annual emission limitations were developed by the multiplying the hourly emission rates by the maximum operating schedule of 8760 hrs/yr, and applying the conversion factor of 2000 lbs/ton. Therefore, provided compliance is shown

with the hourly emission limitations, compliance with the annual emission limitations shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0116009]

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group -EAF Group: P901,P902,P903,

EU ID	Operations, Property and/or Equipment Description
P901	Electric Arc Furnace
P902	Ladle Furnace
P903	Ladle Furnace

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A) (PTI 03-17004, issued 12/20/05)	Combined Emission Limits See b)(2)a. 78.80 lbs sulfur dioxide (SO2) /hr, 345.1 tons SO2/rolling 12-month period 179.60 lbs nitrogen oxides (NOx)/hr, 786.7 tons NOx/rolling 12-month period 2362.50 lbs carbon monoxide (CO)/hr, 10347.8 tons CO/rolling 12-month period 110.30 lbs organic compounds (OC)/hr, 483.1 tons OC/rolling 12-month period <u>Baghouse #1 Stack Emissions:</u> 0.0018 grains particulate matter less than 10 microns (PM10)/dscf, 88.1 tons PM10/yr 0.10 lb Pb/hr, 0.44 tons Pb/yr

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.050 lb Hg/hr, 0.22 ton Hg/yr <u>Baghouse #2 Stack Emissions:</u> 0.0018 grains PM10/dscf, 79.1 tons PM10/yr 0.09 lb Pb/hr, 0.39 tons Pb/yr 0.045 lb Hg/hr, 0.20 ton Hg/yr <u>Fugitive Emissions:</u> 46.9 tons particulate emissions (PE)/rolling 12-month period 35.7 tons PM10/rolling 12-month period 0.23 ton Pb/rolling 12-month period 0.12 ton Hg/rolling 12-month period The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-10 through OAC rule 3745-31-20, 40 CFR Part 60 Subpart AAa and 40 CFR Part 63 Subpart YYYYY.
b.	OAC rule 3745-31-10 through OAC rule 3745-31-20	See b)(2)b.
c.	40 CFR, Part 60, Subpart AAa (40 CFR 60.270a-60.276a)	See b)(2)c. and b)(2)d.
d.	40 CFR, Part 63, Subpart YYYYY (40 CFR 63.10680-63.10692)	See b)(2)e., d)(16) and e)(4).
e.	40 CFR 63.1-15 (40 CFR 63.10690)	Table 1 to Subpart YYYYY of 40 CFR Part 63 – Applicability of General Provisions to Subpart YYYYY shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
f.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See d)(9) through d)(13) e)(1)e., and e)(1)f.
g.	OAC rule 3745-17-07(A)	See b)(2)f.
h.	OAC rule 3745-17-11(B)(2)	See b)(2)g.
i.	OAC rule 3745-18-06(E)	See b)(2)g.
j.	OAC rule 3745-17-07(B)(1)	See b)(2)h.
k.	OAC rule 3745-17-08(B)	See b)(2)i.

(2) Additional Terms and Conditions

a. All of the above emission rates are established for emission units P901, P902, and P903 combined, with individual PM10, Pb and Hg emission limits for each of the two baghouses controlling the three emission units. All particulate matter emitted from the baghouse stacks is PM10.

b. The permittee shall employ Best Available Control Technology (BACT) for controlling NOx, SO2, CO, PE/PM10, Pb, Hg, and Volatile Organic Compounds (VOC) from this emissions unit. BACT has been determined to be the following for each pollutant:

i. PE/PM10 -Operation of a control system consisting of two baghouses with an overall capture efficiency of 98% and a maximum outlet grain loading of 0.0018 grains/dscf.

ii. CO -The operation of a Direct Evacuation Control (DEC) system with air gap, and operation of a cooled post combustion chamber with burners that achieves an overall emission rate of 7.5 lbs of CO/ton of liquid steel produced.

iii. NOx -The operation of a DEC system with air gap, and operation of a cooled post combustion chamber with burners that achieves an overall emission rate of 0.57 lb of NOx /ton of liquid steel produced.

iv. SO2 -The development maintenance, and process operations under a scrap management plan that achieves an overall emission rate of 0.25 lb of SO2/ton of liquid steel produced.

VOC -The development maintenance, and process operations under a scrap management plan that achieves an overall emission rate of 0.35 lb of VOC/ton of liquid steel produced.For the purposes of the BACT review, it was assumed all OC was VOC. The regulation of OC effectively regulates VOC.

v. Pb, Hg - Operation of a control system consisting of two baghouses with an overall capture efficiency of 98% and a maximum outlet grain loading of 0.0018 grains /dscf, and the development, maintenance, and operation under a scrap management plan.

c. The permittee shall not cause to be discharged into the atmosphere any gasses which:

i. exit from the baghouses controlling the EAF and exhibit 3% opacity or greater; and

ii. exit from the melt shop due solely to the operation of the EAF and exhibit 6% opacity or greater.

d. The standard for particulate matter specified by 40 CFR Part 60 Subpart AAa is less stringent than the emission limit established pursuant to OAC rules 3745-31-10 through OAC rule 3745-31-20.

e. With the exception of the requirements for scrap management plans and the CAM requirements, the limitations specified by 40 CFR Part 63, Subpart YYYYY are less stringent than the limitations established pursuant to40 CFR Part 60 Subpart AAa. and OAC rules 3745-31-10 through OAC rule 3745-31-20.

f. The emission limitation specified OAC rule 3745-17-07(A) is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart AAa.

g. The emission limitations specified OAC rule 3745-17-11(B)(2) and OAC rule 3745-18-06(E) are less stringent than the emission limitations established pursuant to OAC rule 3745-31-10 through OAC rule 3745-31- 20.

h. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

i. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

(1) The permittee shall limit production in emissions unit P901 to an average of 315 tons of liquid steel per hour. Annual production from emissions unit P901 shall not exceed 2.76 million tons of liquid steel per year, based upon a rolling, 12-month summation of the monthly liquid steel production.

[OAC rule 3745-77-07(A)(1) and PTI 03-17004]

(2) The permittee shall implement the following control practices:

a. the post combustion chamber ignition burner set point shall be at a minimum of 1.0 MW (megawatt) during any EAF steel making operation;

b. the active EAF DEC offgas ignition burner set point shall be at a minimum of 1.0 MW during any EAF steel making operation; and,

c. the combustion air fan for the active EAF shell shall be set to ensure excess combustion air.

[OAC rule 3745-77-07(A)(1) and PTI 03-17004]

(3) The control system's fan motor amperes set points and damper positions shall be maintained within +/- 15% of the values established during the most recent emission testing that demonstrated the emissions unit was in compliance.

[OAC rule 3745-77-07(A)(1), 40 CFR Part 60 Subpart AAa, and PTI 03-17004]

(4) The "Scrap Management Program" was reviewed and approved by Ohio EPA, NWDO and shall be viewed as part of the operational requirements for the permit. Any change to the "Scrap Management Program" that would increase the amount of these compounds present in the scrap, or result in the emissions of an air contaminant not previously emitted, must be approved by Ohio EPA, NWDO.

[OAC rule 3745-77-07(A)(1) and PTI 03-17004]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall monitor the visible emissions from the two baghouses controlling emissions units P901, P902, and P903. Observations of the opacity of the visible emissions from these control devices shall be performed by a certified visible emission observer as follows:

a. The permittee shall conduct visible emission observations on each control device in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Visible emission observations shall be conducted at least once per day when the furnace is operating in the melting and refining period. These observations shall be taken in accordance with Method 9 for a least three 6-minute periods.

c. The opacities shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6-minute observations shall be required. In this case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause or location of visible emissions observed during a single incident.

d. The permittee shall ensure that an adequate number of personnel on site are "certified" to conduct visible emission observations in accordance with Method 9 procedures. The permittee may choose to have visible emissions observations contracted out, i.e. "certified" personnel may be provided by another company.

e. The permittee shall maintain copies of all daily opacity observations required above. The records shall identify the persons responsible for conducting the readings and verification that their Method 9 certifications are up-to-date.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60 Subpart AAa, and PTI 03-17004]

(2) The permittee shall monitor the operation of each control system and maintain records in accordance with the following requirements:

a. The permittee shall check and record on a once-per-shift basis the control system fan motor amperes and damper positions. The monitoring devices may be installed in any appropriate location such that reproducible monitoring will result. The Ohio EPA, NWDO may require the permittee to demonstrate the accuracy of the monitoring devices relative to Methods 1 and 2 of Appendix A of 40 CFR Part 60.

b. When the permittee is required to demonstrate compliance with the visible emission limitation in condition and at any other time, the Ohio EPA, NWDO may require that all control system fan motor amperes and damper positions be determined during all periods in which a hood is operated for the purpose of capturing emissions.

c. The permittee shall maintain daily records of all instances where the computer program for monitoring the set points established in terms c)(2) and c)(3). above for emissions unit P901 required cessation of, or delays in, furnace operations. The records shall include the reasons for any delay and/or cessation in furnace operations, the duration, a description of the corrective actions taken, and a determination whether or not a malfunction resulting in a violation of a condition of the permit has occurred.

The permittee may petition the Ohio EPA, NWDO for reestablishment of these parameters whenever the permittee can demonstrate to the agency's satisfaction that the operating conditions upon which the parameters were previously established are no longer applicable. Operation at other than baseline values will be considered by the Ohio EPA to be unacceptable operation and maintenance of the control system.

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

(3) At a minimum, the permittee shall perform monthly operational status inspections of the equipment that is important to the overall performance of the collection system. This inspection shall include observations of the capture systems (i.e., bag cleaning mechanisms,pressure sensors, dampers, and damper switches) as well as observations of the physical appearance of dust handling system (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, baghouse dust collection hoppers, and fan erosion). Any deficiencies shall be recorded and proper maintenance performed. The permittee may petition the Ohio EPA, NWDO to approve any alternative to monthly operational status inspections that will provide a continuous record of the operation of each emission capture system.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60 Subpart AAa, and PTI 03-17004]

(4) Daily observations of the opacity of the visible emissions from the meltshop shall be performed by a certified visible emission observer as follows:

a. The permittee shall conduct visible emission observations in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Shop opacity observations shall be conducted at least once when the furnace is operating in the melting and refining period.

c. Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop. Shop opacity shall be recorded for any points where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one observation of shop opacity will be required. In this case, the shop opacity observations must be made for the site of

highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.

d. The permittee shall ensure that an adequate number of personnel on site are "certified" to conduct visible emission observations in accordance with Method 9 procedures. The permittee may choose to have visible emissions observations contracted out, i.e. "certified" personnel may be provided by another company.

e. The permittee shall maintain copies of all daily opacity observations required above. The records shall identify the persons responsible for conducting the readings and verification that their Method 9 certifications are up-to-date.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60 Subpart AAa, and PTI 03-17004]

(5) The permittee shall maintain on site a record of all baghouse dust analysis for both baghouses serving emissions units P901, P902, and P903. At a minimum, the analysis shall contain a record of the Pb content in percent by weight.

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

(6) The permittee shall maintain daily production records of the following for emissions unit P901:

a. the number of hours of operation;

b. the tons of liquid steel produced; and,

c. the average hourly production rate [d)(6)b. divided by d)(6)a.].

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

(7) The permittee shall maintain monthly records of the following for emissions unit P901, P902, and P903 combined:

a. the tons of liquid steel produced;

b. the emissions of SO2, CO, OC, and NOx, and the fugitive emissions of PE, PM_{10}, Pb, and Hg;

c. of annual production of liquid steel, based on a rolling 12-month summation, and

d. the annual emissions of SO2, CO, OC, NOx, and the fugitive emissions of PE, PM_{10}, Pb, and Hg, based on a rolling 12-month summation.

The permittee shall use the continuous monitoring requirements in term d)(14) to determine monthly CO emissions. For all other gaseous pollutants, the permittee shall use the emission factors established from the testing requirements in term f(1). The fugitive PE emissions shall be calculated from the emission factors 1.4 pounds of PE per ton of steel produced for the EAF (emissions unit P901,with 98% capture)and 0.6 pound of PE per ton of steel produced for the Ladle Metallurgy Furnaces (LMFs, emissions units P902 and P903, with 99% capture) applied to the monthly production rates.

Fugitive PM_{10} shall be calculated assuming 76% by weight of all PE is PM_{10}. For fugitive Pb and Hg, the permittee shall calculate emissions by applying the weight percentages established by the most recent testing/analysis which has been performed for these metals.

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

(8) The permittee shall maintain monthly records of the following for each baghouse controlling emissions unit P901, P902, and P903:

a. the hours of operation;

b. the stack emissions of PM10, Pb, and Hg;

c. the annual- year-to-date stack emissions of PM10, Pb, and Hg.

The permittee shall calculate emissions by applying the weight percentages or mass emission rates established by the most recent testing/analysis which has been performed for these pollutants.

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

(9) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for the dust collector(s) controlling this emissions unit operating a fabric filter bag leak detection system. When the performance indicators show operation outside its normal or usual manner of operation, the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in e)(1)e. and e(1)f. below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The dust collectors(s) shall not be configured to have bypass capability.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63 Subpart YYYYY and 40 CFR, Part 64]

(10) After approval of monitoring under this part, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63 Subpart YYYYY and 40 CFR, Part 64]

(11) The permittee shall install, calibrate, maintain, and continuously operate a fabric filter bag leak detection system, in accordance with the system manufacturer's instructions, to monitor the baghouse performance. For this purpose, the term "fabric filter bag leak detection system" means a system that is capable of continuously monitoring relative particulate emissions (dust) loadings in the exhaust of a baghouse in order to detect bag leaks and other upset conditions. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to continuously monitor relative particulate emissions loadings. The fabric filter bag leak detection system shall meet the following:

a. The fabric filter bag leak detection system must be certified by the manufacturer to be capable of detecting particulate emissions at concentrations that are equivalent, at the actual operating conditions of the melt shop baghouse, to 0.0018 grains per dry standard cubic foot or less.

b. The fabric filter bag leak detection system sensor must provide output of relative particulate emissions loading, and the permittee shall continuously record the output signal from the sensor.

c. The fabric filter bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate emissions loading is detected over a preset level, and the alarm must be located such that it can be heard by the appropriate plant personnel.

d. The initial adjustment of the fabric filter bag leak detection system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time. Following the initial adjustment, the permittee shall not adjust the range, averaging period, alarm setpoints, or alarm delay time except as detailed in the operations, maintenance, and monitoring plan. In no event shall the range be increased by more than 100 percent or decreased more than 50 percent over a 365-day period unless a responsible official certifies, by written report, that the baghouse has been inspected and found to be in good operating condition.

e. For positive pressure fabric filter systems, a bag leak detection system must be installed in each baghouse compartment or cell. For negative pressure or induced air fabric filters, the bag leak detector must be installed downstream of the fabric filter. Where multiple bag leak detection systems are required, the system instrumentation and alarm may be shared among the detectors.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63 Subpart YYYYY and 40 CFR, Part 64]

(12) If the fabric filter bag leak detection system alarms, the permittee shall initiate investigation of the melt shop baghouse within 1 hour of the first discovery of the alarming incident for possible corrective action. If corrective action is required, the permittee shall proceed to implement such corrective action, in accordance with a written corrective action plan, as soon as practicable in order to minimize possible exceedances of the emission limitations established in Section b(1). The corrective action plan shall include, at a minimum, the following provisions:

a. Inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in emissions.

b. Sealing off defective bags or filter media.

c. Replacing defective bags or filter media, or otherwise repairing the control device.

d. Sealing off a defective baghouse compartment.

e. Cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system.

f. Shutting down the melt shop operations, including the electric arc shaft furnace.

The permittee shall maintain records of each bag leak detection system alarm, including the date and time of the alarm, the amount of time taken for corrective action to be initiated, the cause of the alarm, an explanation of the corrective actions taken, and when the cause of the alarm was corrected.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63 Subpart YYYYY and 40 CFR, Part 64]

(13) The permittee shall maintain records of all inspections and maintenance performed on the fabric filter bag leak detection system. Records shall include the date and time of each inspection or maintenance activity; the activities performed; and the results of any drift checks and response tests.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63 Subpart YYYYY and 40 CFR, Part 64]

(14) The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions unit in units established in this permit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60.

The permittee shall maintain records of all data obtained by the continuous CO monitoring system including, but not limited to:

a. emissions of CO in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;

b. emissions of CO in pounds per hour and in units of the applicable standard(s) in the appropriate averaging period;

c. results of quarterly cylinder gas audits;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous CO monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous CO monitoring system;

h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous CO monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

[OAC rule 3745-77-07(C)(1) 40 CFR 60.13, 40 CFR Part 60 Appendices B & F, and PTI 03-17004]

(15) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPAs Central Office documenting that the continuous carbon monoxide (CO) monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 4 or 4a (as appropriate) and 6. The letter(s)/document(s) of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60 Appendices B & F, and PTI 03-17004]

(16) The permittee shall comply with the monitoring and recordkeeping requirements for the control of contaminants from scrap pursuant to 40 CFR Part 63, Subpart YYYYY, Section 63.10685

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63 Subpart YYYYY]

(17) The Permit to Install for emissions units P901, P902, and P903 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the Screen3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the Screen3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

a. Pollutant: Manganese TLV (mg/m3): 200
Maximum Hourly Emission Rate (lbs/hr): 1.13
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 2.08

MAGLC (mg/m3): 4.76

b. Pollutant: Zinc TLV (mg/m3): 2000
Maximum Hourly Emission Rate (lbs/hr): 21.0
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 38.7
MAGLC (mg/m3): 47.6

[PTI 03-17004]

(18) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

[PTI 03-17004]

(19) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:" Emissions Unit ID: P901

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model.

[PTI 03-17004]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. any exceedances of the rolling, 12-month emissions limitations specified in term b)(1) of this permit;

b. any exceedances the production restrictions specified in term c)(1) of this permit;

c. all periods of time during which the control system's set points established in term c)(2) were not met;

d. all periods of time during which any of the control system fan motor ampere values or damper positions established in term c)(3) were not met;

e. all periods of time when the bag leak detection alarm was triggered;

f. all periods of time (including the date) in which the permittee did not initiate corrective actions, as defined in the CAM plan, within 1 hour of an alarm from the bag leak detection system; and

g. all periods of time during which the scrap was not handled in accordance with the permittee's "Scrap Management Program".

The permittee shall submit these deviation reports in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 63 Subpart YYYYY, 40 CFR Part 60 Subpart AAa, 40 CFR Part 64 and PTI 03-17004]

(2) The permittee shall submit a semiannual written report of all exceedances of the opacity restrictions contained in term b)(2)c. For the purposes of these reports, exceedances are defined as all 6-minute periods during which the average opacity exceeds these limits. If no deviations occurred during the reporting period, the permittee shall submit an report which states that no deviations occurred. These reports shall be submitted by January 31st and July 31st of each year and shall cover the previous six month period.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60 Subpart AAa, and PTI 03-17004]

(3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, NWDO, documenting all instances of CO emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous CO and other associated monitors;

iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total CO emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous CO monitoring system while the emissions unit was in operation;

viii. results and dates of quarterly cylinder gas audits;

ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction** of the continuous CO monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime** of the continuous CO monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit

[OAC rule 3745-77-07(C)(1), 40 CFR 60.7,and PTI 03-17004]

(4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 63, Subpart YYYYY, Section 63.10685.

[OAC rule 3745-77-07(C)(1) and 40 CFR Part 63 Subpart YYYYY]

(5) The permittee shall maintain daily records of all instances where the computer program for monitoring the set points established in term c)(2). above for emissions unit P901 required cessation of, or delays in, furnace operations. The records shall include the reasons for any delay and/or cessation in furnace operations, the duration, a description of the corrective actions taken, and a determination whether or not a malfunction resulting in a violation of a condition of the permit has occurred.

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for emissions units P901, P902, and P903 in accordance with the following requirements:

a. The emission testing shall be conducted within 180 days after the issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the following emission rates:

i. 78.80 lbs SO2 /hr, 0.25 lb of SO_2 /ton of liquid steel produced
ii. 179.60 lbs NOx/hr, 0.57 lb of NO_x /ton of liquid steel produced
iii. 2362.50 lbs CO/hr, 7.5 lbs of CO/ton of liquid steel produced
iv. 110.30 lbs OC/hr, 0.35 lb of VOC/ton of liquid steel produced

v. <u>Baghouse #1 Stack Emissions:</u>

0.0018 grains PM_{10}/dscf

0.050 lb Hg/hr

vi. Baghouse #2 Stack Emissions:

0.0018 grains PM_{10}/dscf
0.045 lb Hg/hr,

c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:

i. for SO_2, Methods 1-4 and 6 of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 6 of 40 CFR Part 60, Appendix A for determining SO_2 mass emissions.

ii. for NOx, Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for determining total VOC mass emissions.

iii. for CO, Methods 1-4 and 6 of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 6 of 40 CFR Part 60, Appendix A for determining SO_2 mass emissions.

iv. for OC, Methods 1-4 and 18, 25 or 25A (as applicable) of 40 CFR Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in Methods 18, 25, or 25A (as applicable) of 40 CFR Part 60, Appendix A for determining total OC mass emissions.

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.

v. forPM_{10}, Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M, in conjunction with the following requirements:

(a) The sampling time and sample volume for each Method 201 run shall be at least 4 hours and 4.50 dscm (160 dscf) and the sampling time shall include an integral number of heats.

(b) Opacity measurements shall be taken concurrently with each Method 201 run.

(c) The test runs shall be conducted concurrently, unless inclement weather interferes.

vi. for Hg, Methods 1 through 5 and 29 of 40 CFR, Part 60, Appendix A. Appropriate methods shall be used in conjunction with the test methods and procedures specified in 40 CFR Part 60, Appendix A for determining Hg mass emissions. As part of the testing for Hg, the permittee shall determine the weight percentages of Hg as compared to PM_{10},

d. The sampling time for each run while testing SO_2, NOx, CO, and OC shall be 8 hours in duration.

e. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO. The test method(s) which must be employed to demonstrate compliance with the control efficiencies are specified below.

f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

g. During emission testing, the permittee shall also maintain and record the following information:

i. all control system fan motor amperes and damper positions during all periods in which a hood is operated for the purpose of capturing emissions from the EAF's;

ii. charge weights and materials and tap weights and materials;

iii. heat times, including start and stop times, and a log of process operation, including periods of no operation during testing; and

iv. a control device operation log.

h. 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, NWDO. 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, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO 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 of 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, NWDO 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, NWDO.

i. Ongoing compliance with the CO emission limitations contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1)]

(2) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

78.80 lbs SO2 /hr, 0.25 lb of SO_2 /ton of liquid steel produced
179.60 lbs NOx/hr, 0.57 lb of NO_x /ton of liquid steel produced
2362.50 lbs CO/hr, 7.5 lbs of CO/ton of liquid steel produced
110.30 lbs OC/hr, 0.35 lb of VOC/ton of liquid steel produced

Applicable Compliance Method:

Compliance with the hourly CO mass emission limitations shall be determined based on the emission testing conducted in accordance with the test methods and procedures specified in term f(1) and the monitoring requirements specified in term d)(14).

Compliance with the other mass emission limitations and lbs/ton of liquid steel produced limitations shall be determined based on the emission testing conducted in accordance with the test methods and procedures specified in term f(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

b. Emission Limitations:

Baghouse #1 Stack Emissions:

0.0018 grains PM_{10}/dscf, 88.1 tons PM_{10}/yr
0.10 lb Pb/hr, 0.44 tons Pb/yr
0.050 lb Hg/hr, 0.22 ton Hg/yr

Baghouse #2 Stack Emissions:

0.0018 grains PM_{10}/dscf, 79.1 tons PM_{10}/yr
0.09 lb Pb/hr, 0.39 tons Pb/yr
0.045 lb Hg/hr, 0.20 ton Hg/yr

Applicable Compliance Method:

Compliance with the allowable outlet grain loading and the hourly mass emission limitations for Hg shall be determined based on the emission testing conducted in accordance with the test methods and procedures specified in condition f(1).

The stack Pb emissions were established based on a maximum weight percentage of the PM_{10} limit of 0.5% for Pb and will be verified in accordance with the analysis specified in term d)(5). Compliance with the annual emission limitations shall be determined in accordance with record keeping procedures specified in term d)(8).

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

c. Emission Limitations:

345.1 tons SO2/rolling 12-month period
786.7 tons NOx/rolling 12-month period
10347.8 tons CO/rolling 12-month period
483.1 tons OC/rolling 12-month period
46.9 tons PE/rolling 12-month period (fugitive)
35.7 tons PM_{10}/rolling 12-month period (fugitive)
0.23 ton Pb/rolling 12-month period (fugitive)
0.12 ton Hg/rolling 12-month period (fugitive)

Applicable Compliance Method:

Compliance with the annual emission limitations above shall be determined in accordance with the record keeping procedures specified in term d)(7).

[OAC rule 3745-77-07(C)(1) and PTI 03-17004]

d. Emission Limitation:

The permittee shall not cause to be discharged into the atmosphere any gasses which exit from the stack of the baghouse controlling the EAF and exhibit 3% opacity or greater.

Applicable Compliance Method: Compliance shall be demonstrated based upon the record keeping requirements specified in term d(1).

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60 Subpart AAa and PTI 03-17004]

e. Emission Limitation:

The permittee shall not cause to be discharged into the atmosphere any gasses which exit from the melt shop due solely to the operation of the EAF and exhibit 6% opacity or greater.

Applicable Compliance Method: Compliance shall be demonstrated based upon the record keeping requirements specified in term d(4).

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60 Subpart AAa and PTI 03-17004]

g) Miscellaneous Requirements

(1) An alternative exhaust gas discharge configuration for the baghouse controlling the EAF may be used if found to be acceptable by Ohio EPA, pursuant to the requirements of federal and state rules. No less than 60 days prior to changing the exhaust gas discharge configuration, a complete description of the changed must be submitted to Ohio EPA. The final plan must be approved by Ohio EPA prior to any alteration of the exhaust gas discharge configuration. The above exhaust gas discharge requirement is based on the proposed emission limits for the entire plant.

[OAC rule 3745-77-07(C)(1),40 CFR, Part 60, Subpart AAa, and PTI 03- 17004]

(2) The permittee shall maintain a written quality assurance/quality control plan for the continuous CO monitoring system, designed to ensure continuous valid and representative readings of CO emissions in units of the applicable standard(s). 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 CO monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13 and 40 CFR Part 60, Appendix F]

(3) The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.2 and/or 40 CFR 63.2 and Appendix F to 40 CFR Part 60]

9. Emissions Unit Group -Small NG heaters: P006,P008,P009,

EU ID	Operations, Property and/or Equipment Description
P006	Ladle Preheater No 3
P008	Ladle Dryer No 1
P009	Ladle Dryer No 2

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A) (PTI 03-9212 issued 01/09/03)	From each emissions unit individually: 1.6 lbs nitrogen oxides (NOx)/hr and 7.01 tons NOx/yr 0.32 lb carbon monoxide (CO)/hr and 1.40 tons CO/yr 0.05 lb particulate emissions (PE)/hr and 0.21 ton PE/yr 0.0096 lb sulfur dioxide (SO2)/hr and 0.042 ton SO2/yr 0.08 lb organic compounds (OC)/hr and 0.37 ton/yr
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	OAC rule 3745-18-06	See b)(2)c.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from these emissions units is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.

b. These emissions units are exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

c. These emissions unit are exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in these emissions units.

[OAC rule 3745-77-07(A)(1) and PTI 03- 09212]

d) 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 these emissions units.

[OAC rule 3745-77-07(A)(1)]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

1.60 lbs NOx/hr and 7.01 tons NOx/yr

<u>Applicable Compliance Methods:</u>

The permittee may demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 100 lbs NOx/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

0.32 lb CO/hr and 1.40 tons CO/yr

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 84 lbs CO/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation in accordance with Methods 1 through 4 and 10, of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.05 lb PE/hr and 0.21 tons PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with lbs PE/hr limitation above by multiplying a permittee supplied emission factor of 10 lbs PE/mmcu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft./hr).

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with Methods 1 through 5, of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

0.0096 lb SO2/hr and 0.042 ton SO2/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with lb SO2/hr limitation above by multiplying an emission factor from AP-42, Table 1.4-2 (revised 7/98) of 0.6 lb SO2/mmcu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr).

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation in accordance with Methods 1 - 4 and 6, of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

e. Emission Limitations:

0.08 lb OC/hr and 0.37 ton OC/yr

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) by a permittee supplied emission factor of 5.3 lbs OC/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 1 through 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group -small NG heaters Group 2: P004,P005,

EU ID	Operations, Property and/or Equipment Description
P004	Ladle Preheater No 1
P005	Ladle Preheater No 2

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following thetable.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A) (PTI 03-9212 issued 01/09/03)	From each emissions unit individually: 2.0 lbs nitrogen oxides (NOx)/hr and 8.76 tons NOx/yr 0.40 lb carbon monoxide (CO)/hr and 1.75 tons CO/yr 0.06 lb particulate emissions (PE)/hr and 0.26 ton PE/yr 0.012 lb sulfur dioxide (SO2) /hr and 0.053 ton SO2/yr 0.11 lb organic compounds (OC)/hr and 0.46 ton/yr
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	OAC rule 3745-18-06	See b)(2)c.

(2) Additional Terms and Conditions

a. These emissions units are exempt from the visible particulate emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

b. The uncontrolled mass rate of particulate emissions from these emissions units is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Fulton County.

c. These emissions units are exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in these emissions units.

[OAC rule 3745-77-07(A)(1) and PTI 03- 09212]

d) 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 these emissions units.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)1 of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

2.0 lbs NOx/hr and 8.76 tons NOx/yr

<u>Applicable Compliance Methods:</u>

The permittee may demonstrate compliance with the hourly allowable NOx emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 100 lbs NOx/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

0.40 lb CO/hr and 1.75 tons CO/yr

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly allowable CO emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) by the emission factor from AP-42, Table 1.4-1 (revised 7/98) of 84 lbs CO/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation in accordance with Methods 1 through 4 and 10, of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

c. Emission Limitations:

0.06 lb PE/hr and 0.26 ton PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with lbs PE/hr limitation above by multiplying a permittee supplied emission factor of 10 lbs PE/mmcu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft./hr).

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with Methods 1 through 5, of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

0.012 lb SO2/hr and 0.053 ton SO2/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with lb SO2/hr limitation above by multiplying an emission factor from AP-42, Table 1.4-2 (revised 7/98) of 0.6 lb SO2/mmcu.ft of natural gas by the emissions unit's maximum hourly natural gas consumption rate (mm cu.ft/hr).

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation in accordance with Methods 1 - 4 and 6, of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

e. Emission Limitations:

0.11 lb OC/hr and 0.46 ton OC/yr

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly allowable OC emission limitation by multiplying the maximum hourly natural gas consumption rate (mm cu.ft/hr) bya permittee supplied emission factor of 5.3 lbs OC/mm cu.ft.

The tons/yr emission limitation was developed by multiplying the pounds/hour limitation by 8760 and dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 1 through 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.