State of Ohio Environmental Protection Agency

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

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

RE: FINAL PERMIT TO INSTALL MODIFICATION
MARION COUNTY
Application No: 03-03077
Fac ID: 0351010017

CERTIFIED MAIL

RECEIVED
JUN 01 2005
OHIO E.P.A.
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Y	SYNTHETIC MINOR
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	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 5/26/2005

Marion Steel Company
Scott Conway
912 Cheney Avenue
Marion, OH 43302

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA NWDO

Permit To Install **Issue Date: 5/26/2005**
Terms and Conditions **Effective Date: 5/26/2005**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-03077

Application Number: 03-03077
Facility ID: 0351010017
Permit Fee: **$500**
Name of Facility: Marion Steel Company
Person to Contact: Scott Conway
Address: 912 Cheney Avenue
Marion, OH 43302

Location of proposed air contaminant source(s) [emissions unit(s)]:
912 Cheney Avenue
Marion, Ohio

Description of proposed emissions unit(s):
Reheat furnace and rolling mill.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January

31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

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

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

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

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation

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

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

11. Best Available Technology

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

12. Air Pollution Nuisance

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

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Permit Transfers

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

4. Termination of Permit To Install

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

5. Construction of New Sources(s)

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

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

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

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

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
SO_2	0.20
VOC	1.85
PE	2.55
CO	28.22
NOx	211.0

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P009 - 96 tons/hr natural gas steel billet reheat furnace (Administrative modification of PTI #03-03077 issued on August 19, 1987 and modified on August 22, 2002, to revise the limitations for PE, VOC, NOx and CO and establish limitations for SO_2)	OAC rule 3745-31-05(A)(3)	The combined emissions from the burner stack and main stack shall not exceed 0.08 lb SO_2/hr The combined emissions from the burner stack and main stack shall not exceed 0.74 lbs VOC/hr The combined emissions from the burner stack and main stack shall not exceed 1.02 lbs PE/hr (see A.I.2.a) The combined emissions from the burner stack and main stack shall not exceed 11.29 lbs CO/hr The combined emissions from the burner stack and main stack shall not exceed 84.54 lbs NOx/hr No visible particulate emissions from the burner stack and main stack. See A.I.2.b See A.I.2.c
	OAC rule 3745-31-05(C)	The combined emissions from the burner stack and main stack shall not exceed 0.20 tons of SO_2 per rolling, 12-month period (See A.I.2.d)

	The combined emissions from the burner stack and main stack shall not exceed 1.85 tons of VOC per rolling, 12-month period (See A.I.2.d) The combined emissions from the burner stack and main stack shall not exceed 2.55 tons of PE per rolling, 12-month period (See A.I.2.a and A.I.2.d) The combined emissions from the burner stack and main stack shall not exceed 28.22 tons of CO per rolling, 12-month period (See A.I.2.d) The combined emissions from the burner stack and main stack shall not exceed 211.0 tons of NOx per rolling, 12-month period (A.I.2.d)
OAC rule 3745-17-07(A)(1)	See A.I.2.e
OAC rule 3745-17-11(B)(2)	See A.I.2.e
OAC rule 3745-18-06(E)	See A.I.2.e

2. Additional Terms and Conditions

2.a All PE is assumed to be PM_{10}.

2.b Best Available Technology (BAT) for this emissions unit has been determined to be the use of natural gas.

2.c The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).

2.d The permittee has requested the following federally enforceable emission limitations :

The combined emissions from the burner stack and main stack shall not exceed 0.20 tons of SO_2 per rolling, 12-month period (See A.II.1)

The combined emissions from the burner stack and main stack shall not exceed 1.85 tons of VOC per rolling, 12-month period (See A.II.1)

The combined emissions from the burner stack and main stack shall not exceed 2.55 tons of PE per rolling, 12-month period (See A.II.1)

The combined emissions from the burner stack and main stack shall not exceed 28.22 tons of CO per rolling, 12-month period (See A.II.1)

The combined emissions from the burner stack and main stack shall not exceed 211.0 tons of NOx per rolling, 12-month period (See A.II.1)

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

2.f The permittee shall develop a burner tuning/calibration plan that ensures fuel burner(s) are operated and maintained in accordance with the manufacturers recommendations to ensure efficient combustion of the fuel and to ensure compliance with the applicable emission limitations . The burner tuning/calibration plan shall contain the evaluation of and adjustment to manufacturer's specifications of such parameters as fuel flow, fuel pressure, flue gas analysis, etc. The plan shall also contain information addressing the required frequency of the burner tuning/calibration. The plan shall be submitted to the appropriate Ohio EPA district office or local air agency with 90 days of the issuance of this permit. The burner tuning/calibration plan will require approval by the Ohio EPA.

II. Operational Restrictions

1. The maximum annual natural gas usage rate for this emissions unit shall not exceed 672 $mmft^3$, based upon a rolling, 12-month summation of the natural gas usage rates. The permittee has existing natural gas usage records therefore the establishment of natural gas usage for the first 12 months of operation under the provisions of this permit are not necessary to ensure federal enforceability.

2. The permittee shall burn only natural gas in this emissions unit.

3. The permittee shall have the burners on this emissions unit calibrated on an annual basis.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

   a. the natural gas usage rate for each month, in $mmft^3$;

   b. the rolling, 12-month summation of the natural gas usage rates, in $mmft^3$;

   c. the calculated NOx emissions for each month, in tons, using the following equation:

      NOx emissions = (A.III.1.a) x (629 lbs NOx/$mmft^3$*) x (ton/2000 lbs);

   d. the rolling 12-month summation of NOx emissions;

*The NOx emission factor of 629 lb NOx/$mmft^3$ was established from stack test data.

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

3. The permittee shall maintain records of the annual calibration of the burners on this emissions unit.

4. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions or presence of flames from the stacks serving this emissions unit. The presence or absence of visible emissions or flames shall be noted in an operations log. If visible emissions or flames are observed, the permittee shall also note the following in the operations log:

   a. the color of the emissions and/or presence of flames;

   b. the total duration of any visible emission or flame incident;

   c. any corrective actions taken to eliminate the visible emissions or flames.

5. The permittee shall record the results of each burner tuning/calibration performed. Tuning/calibration results shall include pre-tuning and post-tuning information. The tuning/calibration information collected and recorded shall conform with the permittee's tuning/calibration plan (see A.I.2.f)

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month natural gas usage rate limitation. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. 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.

3. The permittee shall submit a report that certifies that the annual calibration of the burners on this emission has been completed. This report shall be submitted within 30 days after the calibration has been conducted.

4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions or flames were observed from the stacks serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions or flames. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the 6-month period.

5. The permittee shall submit a copy of the results for each burner tuning/calibration performed to the appropriate Ohio EPA district office or local air agency. These reports shall be submitted to the Ohio EPA district office or local air agency within 30 days of the date that the burner tuning/calibration was performed.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:

   a. The emissions testing shall be conducted no earlier than 12 months and no less than 6 months prior to the expiration of the current Title V permit (i.e., between May 22, 2006 and November 22, 2006) following issuance of this permit.

   b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, NOx and CO.

   c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A; for NOx, Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A; for CO, Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

   d. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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

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

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

   a. Emission Limitation: The combined emissions from the burner stack and main stack shall not exceed 0.74 lbs VOC/hr and 1.85 tons of VOC per rolling 12-month period

Applicable Compliance Method: The hourly VOC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4, 18, 25 or 25A as applicable of 40 CFR Part 60, Appendix A.

*The potential to emit is based on a maximum hourly gas usage rate of 0.1344 $mmft^3$ and an emission factor of 5.5 $lb/mmft^3$ (based on AP-42, Section 1.4 [7/98]).

The tons per rolling 12-month period limitation was developed by multiplying the emission factor of 5.5 $lb/mmft^3$ by the maximum annual natural gas usage rate of 672 $mmft^3/yr$ and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the maximum annual natural gas usage restriction, compliance with the annual limitation shall be assumed.

b. Emission Limitation: The combined emissions from the burner stack and main stack shall not exceed 1.02 lbs PE/hr and 2.55 tons PE per rolling 12-month period

Applicable Compliance Method: The hourly PE emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly PE limitation by emissions testing conducted in accordance with Methods 1 through 5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A .

*The potential to emit is based on a maximum hourly gas usage rate of 0.1344 $mmft^3$ and an emission factor of 7.6 $lb/mmft^3$ (based on AP-42, Section 1.4 [7/98]).

The tons per rolling 12-month period limitation was developed by multiplying the emission factor of 7.6 $lb/mmft^3$ by the maximum annual natural gas usage rate of 672 $mmft^3/yr$ and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the maximum annual natural gas usage restriction, compliance with the annual limitation shall be assumed.

c. Emission Limitation: The combined emissions from the burner stack and main stack shall not exceed 11.29 lbs CO/hr and 28.22 tons of CO per rolling 12-month period

Applicable Compliance Method: The hourly CO emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly CO limitation by emissions testing conducted in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A

*The potential to emit is based on a maximum hourly gas usage rate of 0.1344 $mmft^3$ and an emission factor of 84 $lbs/mmft^3$ (based on AP-42, Section 1.4 [7/98]).

The tons per rolling 12-month period limitation was developed by multiplying the emission factor of 84 lbs/mmft^3 (based on AP-42, Section 1.4 [7/98]) by the maximum annual natural gas usage rate of 672 mmft^3/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the maximum annual natural gas usage restriction, compliance with the annual limitation shall be assumed.

d. Emission Limitation: The combined emissions from the burner stack and main stack shall not exceed 84.54 lbs NOx/hr and 211.0 tons NOx per rolling 12-month period

Applicable Compliance Method: The hourly NOx emission limitation is based on the emissions unit's
potential to emit*, therefore, no hourly recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly NOx limitation by emissions testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A

*The potential to emit is based on a maximum hourly gas usage rate of 0.1344 mmft^3 and an emission factor of 629 lbs/mmft^3 (based on stack test data).

The permittee shall demonstrate compliance with the tons per rolling 12-month period limitation by the recordkeeping in section A.III.1.

e. Emission Limitation: The combined emissions from the burner stack and main stack shall not exceed 0.08 lbs SO_2/hr and 0.20 tons of SO_2 per rolling 12-month period

Applicable Compliance Method: The hourly SO_2 emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly CO limitation by emissions testing conducted in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

*The potential to emit is based on a maximum hourly gas usage rate of 0.1344 mmft^3 and an emission factor of 0.6 lb/mmft^3 (based on AP-42, Section 1.4 [7/98]).

The tons per rolling 12-month period limitation was developed by multiplying the emission factor of 0.6 lbs/mmft^3 (based on AP-42, Section 1.4 [7/98]) by the maximum annual natural gas usage rate of 672 mmft^3/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the maximum annual natural gas usage restriction, compliance with the annual limitation shall be assumed.

f. Emission Limitation: No visible particulate emissions from the burner stack and main stack.

Applicable Compliance Method: If required, compliance shall be determined in accordance with the test method and procedures in Method 22 of 40 CFR Part 60, Appendix A.

g. Emission Limitation: Maximum annual natural gas usage shall not exceed ~~600,000~~ *672* mmft^3, based upon a rolling 12-month summation of the natural gas usage rates.

Applicable Compliance Method: The permittee shall demonstrate compliance with the mmft^3 based upon a rolling 12-month summation limitation by the recordkeeping in section A.III.1.

3. Burner Tuning/Calibration

a. Introduction

The permittee is required to conduct periodic tuning/calibration of the furnace burner system. The purpose of this tuning is to ensure that the burner is adjusted properly so that air pollution emissions remain in compliance with allowable emissions rates and are minimized.

b. Qualifications for Burner Tuning/Calibration

Technicians who conduct the burner tuning/calibration must be qualified to perform the expected tasks. The permittee is required to provide training to the technicians who perform the burner tuning/calibration procedure. Technicians who are qualified shall, at a minimum, have passed manufacturers training concerning burner tuning/calibration, or have been trained by someone who has completed the manufacturers training concerning burner tuning/calibration.

c. Burner Tuning/Calibration Procedure and Frequency

The permittee shall perform burner tuning/calibration in accordance with and at frequencies outlined in the burner tuning/calibration plan required in A.I.2.f

VI. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A.I.1, A.II.1, A.III.1, A.IV.1, A.V.2.b, A.V.2.d and A.V.2.f.

2. Burner Tuning Form (see attached form)

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P009 - 96 tons/hr natural gas steel billet reheat furnace (Administrative modification of PTI #03-03077 issued on August 19, 1987 and modified on August 22, 2002, to revise the limitations for PE, VOC, NOx and CO and establish limitations for SO_2)	None	None

2. **Additional Terms and Conditions**

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None