



State of Ohio Environmental Protection Agency

P080, Fall
P085 -> P088

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

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

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Lorain County
Application No: 02-1888
SYNTHETIC MINOR
NETTING

CERTIFIED MAIL

May 6, 1998

USS KOBE STEEL COMPANY
MARK CONTI
1807 EAST 28TH STREET
LORAIN, OH 44055

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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 with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's 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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
NORTHEAST DISTRICT OFFICE, DAPC

RECEIVED
MAY 12 1998
OHIO EPA NEDO



Permit to Install Terms and Conditions

Application No. 02-1888
APS Premise No. 0247080229
Permit Fee: \$3800.00

Name of Facility: USS KOBE STEEL COMPANY

Person to Contact: MARK CONTI

Address: 1807 EAST 28TH STREET
LORAIN, OH 44055

Location of proposed source(s): 1807 EAST 28TH STREET
LORAIN, OHIO

Description of proposed source(s):
LEADED STEEL PRODUCING FACILITY (LADLE LEAD INJECTION, STEEL
TRANSFER & CASTING, TORCH CUT-OFF AND SUPPORT OPERATIONS).

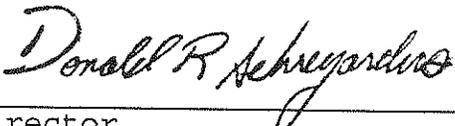
Date of Issuance: May 6, 1998

Effective Date: May 6, 1998

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons)

may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for USS KOBE STEEL COMPANY located in Lorain County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P080	No. 2 ladle metallurgy facility (mod)	Existing fume collection system/fabric filter dust collector	3745-31-05 3745-17-07* 3745-17-08* 3745-17-11*	PM: 6.60 lbs/hr, 7.77 TPY; PM ₁₀ : 5.43 lbs/hr, 6.42 TPY; Lead: 0.577 lb/hr, 0.361 TPY Fabric filter dust collector (PM 0.002 gr/dscf) **
F011	No. 2 continuous bloom caster including ladle transfer of leaded steel (mod)	Ladle cover/fume collection system-close fitting hoods/fabric filter dust collector	3745-31-05 3745-17-07* 3745-17-08* 3745-17-11*	PM: 19.26 lbs/hr, 17.89 TPY, PM ₁₀ : 6.17 lbs/hr, 13.27 TPY; Lead: 0.0712 lb/hr, 0.060 TPY Fabric filter dust collector (PM 0.002 gr/dscf) **
P085	Caster torch cut-off operation (mod)	Close fitting hood fume collection system/fabric filter dust collector	3745-31-05 3745-17-07* 3745-17-08* 3745-17-11*	PM: 1.39 lbs/hr, 1.18 TPY; PM ₁₀ : 1.34 lbs/hr, 1.14 TPY; Lead: 0.0712 lbs/hr; 0.061 TPY Fabric filter dust collector (PM 0.002 gr/dscf) **
P086	Final tundish cooling operation (mod)	Close fitting hood fume collection system/fabric filter dust	3745-31-05 3745-17-07* 3745-17-08* 3745-17-11*	PM: 0.0002 lb/hr, 0.001 TPY; PM ₁₀ : 0.0002 lb/hr, 0.001 TPY; Lead: 0.000011 lb/hr, 0.00003 TPY Fabric filter dust

*2/15/98
 3745-17-08
 - removed*

NOT IN STARTS

TESTED

NOT IN STARTS

UNTESTED FROM TOWER

NOT IN STATE

NOT IN STATE

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		collector		collector (PM 0.002 gr/dscf) **
P087	Ladle slag dump station (mod)	Evacuated enclosure fume collection system/fabric filter dust collector	3745-31-05 3745-17-07* 3745-17-08* 3745-17-11*	PM: 1.83 lbs/hr, 0.31 TPY; PM ₁₀ : 1.37 lbs/hr, 0.23 TPY; Lead 0.103 lbs/hr, 0.018 TPY Fabric filter dust collector (PM 0.002 gr/dscf) **
P088	Ladle make-up station (mod)	Fume collection system hood/fabric filter dust collector	3745-31-05 3745-17-07* 3745-17-08* 3745-17-11*	PM: 2.88 lbs/hr, 0.33 TPY; PM ₁₀ : 2.88 lbs/hr, 0.33 TPY; Lead 0.146 lb/hr 0.017 TPY Fabric filter dust collector (PM 0.002 gr/dscf) **

* OAC rules 3745-17-07, 3745-17-08 and 3745-17-11 (less stringent than BAT)

** Subject to the attached Additional Special Terms and Conditions.

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>	<u>Net Emission Increase Tons/Year</u>
PM	27.48	
PM ₁₀	21.38	+12.74
Lead	0.516	

PERFORMANCE TEST REQUIREMENTS

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

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

<u>Source</u>	<u>Pollutants</u>
P080, F011, P085, P086, P087 and P088	PM

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Northeast District Office - DAPC, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Number 2 Ladle Metallurgy Facility (P080)

- CAPTURE
1. The Number 2 Ladle Metallurgy Facility, including a ladle arc furnace and attached alloy handling system, has been installed with a water-cooled hood covering the ladle and fume collection systems capable of capturing a minimum of 99 percent of the generated emissions of particulate from the air contaminant source operation including bulk alloy material handling, alloy system conveyors and transfer points, and steel processing in the ladle arc furnace. Visible particulate emissions of fugitive dust from the Number 2 Ladle Metallurgy Facility shall not exceed five percent opacity as a six-minute average.

USS/Kobe Steel Company shall employ and maintain the existing fume collection system for the Number 2 Ladle Arc Furnace which shall capture 99 percent of the particulate matter and lead emissions from the ladle lead injection operation. Visible particulate emissions of fugitive dust from the Number 2 Ladle Arc Furnace during the lead injection operation shall not exceed five percent opacity as a six-minute average.

Particulate emissions captured by the fume collection system for the Number 2 Ladle Arc Furnace shall be exhausted to a fabric filter dust collector. The Number 2 Ladle Arc Furnace controls shall operate at an overall particulate emission control efficiency of at least 94.6 percent. Particulate emissions from the fabric filter dust collector outlet shall not exceed 0.002 grains of particulate emissions per dry standard cubic foot of exhaust gases and visible particulate emissions from the outlet shall not exceed five percent opacity as a six-minute average.

Particulate emissions captured by the dust collection systems for alloy handling, including the bulk alloy receiving, storage and transfer system and the alloy system conveyors and transfer points, shall be exhausted to fabric filter dust collectors. Particulate emissions from the fabric filter dust collector outlets shall not exceed 0.0052 grains of particulate emissions per dry standard cubic foot of exhaust gases. Visible particulate emissions from the fabric filter outlets shall not exceed five percent opacity as a six-minute average.

B. Number 2 Continuous Bloom Caster (F011)

1. Argon gas shrouding shall be employed to minimize or eliminate visible particulate emissions of fugitive dust from molten steel transfers between the steel ladle and tundish. Visible particulate emissions of fugitive dust from all operations associated with the Number 2 Continuous Bloom Caster including the addition of fluxes, tundish and ladle slag dumping, caster pouring and cast steel cut-off torches shall not exceed five percent opacity as a six-minute average.

The Number 2 Continuous Bloom Caster, including ladle transfer of molten leaded steel to the caster, shall be modified by the addition of the following particulate emission control systems:

- a. a ladle cover shall be used at all times to minimize or eliminate visible particulate emissions of fugitive dust during ladle transfer of molten leaded steel from the Number 2 LMF to the caster; and,

- b. during leaded steel casting, a fume collection system consisting of an evacuated ladle cover and close fitting hood over the tundish shall be installed to minimize or eliminate visible particulate emissions of fugitive dust. A close fitting hood shall be installed over the tundish to minimize visible particulate emissions of fugitive dust during initial tundish cooling. The collection system shall be designed to capture 99 percent of the particulate matter and lead emissions from the molten leaded steel ladle and during initial tundish cooling. The collection system for the tundish top shall be designed to capture a minimum of 80 percent of the particulate matter and lead emissions during the initial pouring of molten leaded steel into the tundish from the ladle. Capture of emissions shall improve to the design continuous casting capture efficiency of 99 percent after the initial tundish filling period.

Visible particulate emissions of fugitive dust from the Number 2 Continuous Bloom Caster during the ladle transfer of molten leaded steel to the caster, the initial tundish filling period, continuous casting of leaded steel, and initial cooling of the tundish shall not exceed five percent opacity as a six-minute average.

Particulate emissions captured by the fume collection system for the Number 2 Continuous Bloom Caster shall be exhausted to a fabric filter dust collector during leaded steel production. Particulate emissions from the fabric filter dust collector outlet shall not exceed 0.002 grains of particulate emissions per dry standard cubic foot of exhaust gases and visible particulate emissions from the outlet shall not exceed five percent opacity as a six-minute average.

C. Caster Torch Cut-Off Operation (P085)

1. A fume collection system consisting of a close fitting hood over the caster cut-off torches shall be installed to minimize or eliminate visible particulate emissions of fugitive dust generated during leaded steel caster torch cut-off operations. The collection system shall be designed to capture 90 percent of the particulate matter and lead emissions from the leaded steel caster torch cut-off operation. Visible particulate emissions of fugitive dust from Caster Torch Cut-Off Operations shall not exceed five percent opacity as a six-minute average.

Particulate emissions captured by the fume collection system for the leaded steel caster torch cut-off

operation shall be exhausted to a fabric filter dust collector. Particulate emissions from the fabric filter dust collector outlet shall not exceed 0.002 grains of particulate emissions per dry standard cubic foot of exhaust gases and visible particulate emissions from the outlet shall not exceed five percent opacity as a six-minute average.

D. Final Tundish Cooling Operation (P086)]

1. A fume collection system consisting of a close fitting hood over the tundish during the final cooling operation shall be installed to minimize or eliminate visible particulate emissions of fugitive dust. The collection system shall be designed to capture 90 percent of the particulate matter and lead emissions from the final tundish cooling operation. Visible particulate emissions of fugitive dust from the final tundish cooling operation shall not exceed five percent opacity as a six-minute average during leaded steel production.

Particulate emissions captured by the fume collection system for the Final Tundish Cooling Operation shall be exhausted to a fabric filter dust collector during leaded steel production.

Particulate emissions from the fabric filter dust collector outlet shall not exceed 0.002 grains of particulate emissions per dry standard cubic foot of exhaust gases and visible particulate emissions from the outlet shall not exceed five percent opacity as a six-minute average.

E. Ladle Slag Dump Station (P087)

1. A fume collection system consisting of an evacuated enclosure of the ladle slag dump station shall be installed to minimize or eliminate visible particulate emissions of fugitive dust. The collection system shall be designed to capture 99 percent of the particulate matter and lead emissions from the ladle slag dump station. Visible particulate emissions of fugitive dust from the ladle slag dump station shall not exceed five percent opacity as a six-minute average during leaded steel production.

Particulate emissions captured by the fume collection system for the Ladle Slag Dump Station shall be exhausted to a fabric filter dust collector during leaded steel production. Particulate emissions from the fabric filter dust collector outlet shall not exceed 0.002 grains of particulate emissions per dry standard cubic foot of exhaust gases and visible particulate emissions from the outlet shall not exceed five percent opacity as a six-minute average.

F. Ladle Make-Up Station (P088)

1. A fume collection system consisting of a hood over the ladle spout oxygen lancing work area shall be installed to minimize or eliminate visible particulate emissions of fugitive dust. The collection system shall be designed to capture 90 percent of the particulate matter and lead emissions from the ladle spout oxygen lancing operation. Visible particulate emissions of fugitive dust from the ladle spout oxygen lancing operation shall not exceed five percent opacity as a six-minute average during leaded steel production.

Particulate emissions captured by the fume collection system for the Ladle Make-Up Station shall be exhausted to a fabric filter dust collector during leaded steel production. Particulate emissions from the fabric filter dust collector outlet shall not exceed 0.002 grains of particulate emissions per dry standard cubic foot of exhaust gases and visible particulate emissions from the outlet shall not exceed five percent opacity as a six-minute average.

G. Leaded Steel Production Limitation

1. USS/Kobe Steel Company shall restrict the production of Leaded Steel to 300,000 tons per year based upon a rolling 365-day period.

For the first twelve months of operation, USS/Kobe Steel Company shall not exceed the following leaded steel production limits for the specific time period.

<u>Month</u>	<u>Total Allowable Leaded Steel Production</u>
1	25,000 tons
1-2	50,000 tons
1-3	75,000 tons
1-4	100,000 tons
1-5	125,000 tons
1-6	150,000 tons
1-7	175,000 tons
1-8	200,000 tons
1-9	225,000 tons
1-10	250,000 tons
1-11	275,000 tons
1-12	300,000 tons

After the first twelve months of operation, USS/Kobe Steel Company shall restrict the production of leaded steel to 300,000 tons per year, based upon a consecutive 365-day period, rolled on a daily basis.

H. Steel Throughput Limitations

1. USS/Kobe Steel Company shall restrict steel throughput for the Number 2 Ladle Metallurgy Facility and the Number 2 Continuous Bloom Caster to 1,200,000 tons per year, based upon a consecutive 365-day period, rolled on a daily basis. This restriction was required through a consent decree and was part of the original Permit to Install No. 02-7768. Quarterly reports have been submitted since July 1, 1996 to demonstrate compliance with this limit.

I. Recordkeeping and Reporting Requirements

1. Beginning with the first full calendar quarter after installation of the Leaded Steel Producing Facility, USS/Kobe Steel Company shall submit quarterly reports to the Ohio EPA, Northeast District Office which shall include records of the daily leaded steel production from the facility. After the first full year of operation the quarterly reports shall also include records of the leaded steel production for the preceding consecutive 365-day period, rolled on a daily basis. The reports shall be submitted by January 15, April 15, July 15 and October 15 of each year.

In addition, USS/Kobe Steel Company shall continue to maintain individual source daily steel throughput production records for the Number 2 Ladle Metallurgy Facility and the Number 2 Continuous Bloom Caster to document compliance with the limitations specified herein. Quarterly reports shall be submitted by the above dates including individual daily steel throughput records for these emissions units and total steel throughput records for the preceding consecutive 365-day periods, rolled on a daily basis.

2. USS/Kobe Steel Company shall submit deviation (excursion) reports that identify all exceedances of the rolling, 365-day leaded steel production limitation for the facility.
3. USS/Kobe Steel Company shall submit deviation (excursion) reports that identify all exceedances of the rolling, 365-day steel throughput restriction for the No. 2 Ladle Metallurgy Facility and the No.2 Continuous Bloom Caster.
4. USS/Kobe Steel Company shall submit deviation (excursion) reports that identify all exceedances of the fabric filter dust collector outlet visible particulate emission opacity limits and the fugitive dust visible particulate emission limitations specified herein. For the purposes of these reports, exceedances are defined as all 6-minute periods during which the average opacity exceeds five (5) percent.

5. 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 emission limitations or production/throughput restrictions that have been detected by the testing and/or 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 Ohio EPA, Northeast District Office. If no deviations occurred during a calendar quarter, USS/Kobe shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 15, April 15, July 15, and October 15 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.)

J. Testing Requirements

1. Compliance with the particulate and visible emission limitations in paragraphs A. through F. of these Additional Special Terms and Conditions shall be determined in accordance with the following methods:

- a. No. 2 Ladle Arc Furnace Controls:

Emission Limitation

An overall particulate emission control efficiency of at least 94.6 percent shall be achieved by the No. 2 ladle arc furnace controls.

Applicable Compliance Method

Test Methods as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources":

- i. Method 1 for sample and velocity traverses;
- ii. Method 2 for velocity and volumetric flow rate;
- iii. Method 3 for gas analysis;
- iv. Method 4 for moisture content in stack gases;
and,
- v. Method 5 for particulate emissions from stationary sources including both inlet and outlet testing.

b. No. 2 Ladle Arc Furnace Fabric Filter Dust Collector Stacks:

Emission Limitation

Particulate emissions from the fabric filter dust collector stacks shall not exceed 0.002 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method

Test Methods as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources:"

- i. Method 1 for sample and velocity traverses;
- ii. Method 2 for velocity and volumetric flow rate;
- iii. Method 3 for gas analysis;
- iv. Method 4 for moisture content in stack gases; and,
- v. Method 5 for particulate emissions from stationary sources.

c. No. 2 Ladle Arc Furnace Fabric Filter Dust Collector Stacks:

Emission Limitation

Visible particulate emissions from the stack outlets shall not exceed five percent opacity as a six-minute average.

Applicable Compliance Method

Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" for the opacity of visible emissions.

d. Bulk Alloy Receiving, Storage, Conveying and Transfer System Fabric Filter Dust Collectors:

Emission Limitation

Particulate emissions from the fabric filter dust collector stacks shall not exceed 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method

Test Methods as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources":

- i. Method 1 for sample and velocity traverses;
 - ii. Method 2 for velocity and volumetric flow rate;
 - iii. Method 3 for gas analysis;
 - iv. Method 4 for moisture content in stack gases; and,
 - v. Method 5 for particulate emissions from stationary sources.
- e. Bulk Alloy Receiving, Storage, Conveying and Transfer System Fabric Filter Dust Collector Stacks:

Emission Limitations

Visible particulate emissions from the stack outlets shall not exceed five percent opacity as a six-minute average.

Applicable Compliance Method

Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" for the opacity of visible emissions.

- f. No.2 Continuous Bloom Caster Leaded Steel Fabric Filter Dust Collector Stack:

Emission Limitation

Particulate emissions from the fabric filter dust collector stack shall not exceed 0.002 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method

Test Methods as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources":

- i. Method 1 for sample and velocity traverses;
- ii. Method 2 for velocity and volumetric flow rate;
- iii. Method 3 for gas analysis;

iv. Method 4 for moisture content in stack gases;
and,

v. Method 5 for particulate emissions from
stationary sources.

g. No. 2 Continuous Bloom Caster Leaded Steel Fabric
Filter Dust Collector Stack:

Emission Limitation

Visible particulate emissions from the stack outlet
shall not exceed five percent opacity as a six-
minute average.

Applicable Compliance Method

Test Method 9 as set forth in the "Appendix on Test
Methods" in 40 CFR, Part 60, "Standards of
Performance for New Stationary Sources" for the
opacity of visible emissions.

h. Leaded Steel Caster Torch Cut-Off Fabric Filter Dust
Collector Stack:

Emission Limitation

Particulate emissions from the fabric filter dust
collector stack shall not exceed 0.002 grain of
particulate emissions per dry standard cubic foot
of exhaust gases.

Applicable Compliance Method

Test Methods as set forth in the "Appendix on Test
Methods" in 40 CFR, Part 60, "Standards of
Performance for New Stationary Sources":

i. Method 1 for sample and velocity traverses;

ii. Method 2 for velocity and volumetric flow rate;

iii. Method 3 for gas analysis;

iv. Method 4 for moisture content in stack gases;
and,

v. Method 5 for particulate emissions from
stationary sources.

i. Leaded Steel Castor Torch Cut-Off Fabric Filter Dust Collector Stack:

Emission Limitation

Visible particulate emissions from the stack outlet shall not exceed five percent opacity as a six-minute average.

Applicable Compliance Method

Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" for the opacity of visible emissions.

j. Leaded Steel Final Tundish Cooling Fabric Filter Dust Collector Stack:

Emission Limitation

Particulate emissions from the fabric filter dust collector stack shall not exceed 0.002 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method

Test Methods as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources":

- i. Method 1 for sample and velocity traverses;
- ii. Method 2 for velocity and volumetric flow rate;
- iii. Method 3 for gas analysis;
- iv. Method 4 for moisture content in stack gases; and,
- v. Method 5 for particulate emissions from stationary sources.

k. Leaded Steel Final Tundish Cooling Fabric Filter Dust Collector Stack:

Emission Limitation

Visible particulate emissions from the stack outlet shall not exceed five percent opacity as a six-minute average.

Applicable Compliance Method

Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" for the opacity of visible emissions.

1. Leaded Steel Ladle Slag Dump Station Fabric Filter Dust Collector Stack:

Emission Limitation

Particulate emissions from the fabric filter dust collector stack shall not exceed 0.002 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method

Test Methods as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources":

- i. Method 1 for sample and velocity traverses;
- ii. Method 2 for velocity and volumetric flow rate;
- iii. Method 3 for gas analysis;
- iv. Method 4 for moisture content in stack gases; and,
- v. Method 5 for particulate emissions from stationary sources.

m. Leaded Steel Ladle Slag Dump Station Fabric Filter Dust Collector Stack:

Emission Limitation

Visible particulate emissions from the stack outlet shall not exceed five percent opacity as a six-minute average.

Applicable Compliance Method

Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" for the opacity of visible emissions.

n. Leaded Steel Ladle Make-Up Station Fabric Filter
Dust Collector Stack:

Emission Limitation

Particulate emissions from the fabric filter dust collector stack shall not exceed 0.002 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method

Test Methods as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources":

- i. Method 1 for sample and velocity traverses;
- ii. Method 2 for velocity and volumetric flow rate;
- iii. Method 3 for gas analysis;
- iv. Method 4 for moisture content in stack gases;
and,
- v. Method 5 for particulate emissions from stationary sources.

o. Leaded Steel Ladle Make-up Station Fabric Filter
Dust Collector Stack:

Emission Limitation

Visible particulate emissions from the stack outlet shall not exceed five percent opacity as a six-minute average.

Applicable Compliance Method

Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" for the opacity of visible emissions.

p. Visible Particulate Emissions of Fugitive Dust:

Emission Limitation

Visible particulate emissions of fugitive dust from leaded or unleaded steel processing through the No. 2 Ladle Metallurgy Facility, the No. 2 Continuous Bloom Caster Operation or the Caster Torch Cut-Off Operation shall not exceed five percent opacity as a six-minute average. In addition, visible particulate emissions of fugitive dust from the

Leaded Steel Final Tundish Cooling Operation, the Leaded Steel Ladle Slag Dump Station and the Leaded Steel Ladle Make-Up Station shall not exceed five percent opacity as a six-minute average.

Applicable Compliance Method

Test Method 9 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60, "Standards of Performance for New Stationary Sources" for the opacity of visible emissions.

K. Miscellaneous Requirements

1. Emission Unit Shut Down Requirement

- a. The conventional leaded steel teeming operation (P023) shall be permanently discontinued upon start-up of the new Leaded Steel Producing Facility.