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

10/30/2014

Certified Mail

Ms. Karen Bezoski-Davis
Lorain Tubular Company LLC
2199 E. 28th Street
Lorain, OH 44055

Facility ID: 0247080961
Permit Number: P0110998
County: Lorain

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, The Chronicle Telegram. 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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

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, Northeast District Office at (330)425-9171.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NEDO

PUBLIC NOTICE
10/30/2014 Issuance of Draft Air Pollution Title V Permit

Lorain Tubular Company LLC
2199 E. 28th Street,
Lorain, OH 44055
Lorain County
FACILITY DESC.: Iron and Steel Pipe and Tube Manufacturing from Purchased Steel
PERMIT #: P0110998
PERMIT TYPE: Renewal
PERMIT DESC: Renewal Title V operating permit for a steel plant.

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: Anthony Becker, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0247080961
Facility Name:	Lorain Tubular Company LLC
Facility Description:	Steel plant
Facility Address:	2199 E. 28th Street, Lorain, OH 44055
Permit #:	P0110998, Renewal

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☒ Carbon Monoxide ☒ Volatile Organic Compounds ☒ Nitrogen Oxides
☒ Particulate Matter ≤ 10 microns ☐ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants
☐ Maximum Available Control Technology Standard(s) ☐ GHG ☐ Title IV

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	YES
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A

Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	PTI P0106201 issued 08/04/10 for emissions units P049, P050 and P051 have been incorporated into this renewal. P0117763issued 10/7/14 for emissions units P040 has been incorporated into this renewal.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	P048, PE.

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1.	77-07(C)		List facility-wide terms and conditions that are state enforceable.
B.2.	25-03		Requirement for facility to submit emission control action program in accordance with OAC rule 3745-25.
B.3.	77-07(A)		Lists insignificant emissions units subject to OAC rule 3745-31-03(A)(4)(b)
B.4.	77-07		Lists other insignificant emissions units with applicable requirements.

C. Emissions Unit Terms and Conditions

Key:
EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
F001	10% opacity as a 3-minute average	17-07(B)(8)(a)		N	Y	Y	N	Y	Y	N	N	N	OR: The following restriction applies when using dust suppressant as fugitive dust control on unpaved roadways: a. Fugitive dust suppressants shall be certified with the PCB limitations set forth in 40 CFR 76, and there are no listed hazardous waste; b. No used oil shall be applied as dust suppressant; c. Dust suppressant shall be applied in such a manner as to prevent pollution of waters of the State as required by the ORC, section 6111. ET: M,R,Rp are sufficient to demonstrate compliance.
F001	RACM	17-08(B)		N	Y	Y	N	Y	Y	N	N	N	OR: The following restriction applies when using dust suppressant as fugitive dust control on unpaved roadways: a. Fugitive dust suppressants shall be certified with the PCB limitations set forth in 40 CFR 76, and there are no listed hazardous waste; b. No used oil shall be applied as dust suppressant; c. Dust suppressant shall be applied in such a manner as to prevent pollution of waters of the State as required by the ORC, section 6111. ET: M,R,Rp are sufficient to demonstrate compliance.
P002	0.10 lbs particulate emissions (PE) /hr and 0.42 ton PE/yr 0.03 lb sulfur dioxide (SO2)/hr 0.13 ton SO2/yr 0.072 lb nitrogen oxides (NOx)/mmBtuheat input (as measured at the maximum firing	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) OR: The permittee shall burn only natural gas ET: M,R,Rp are sufficient to demonstrate compliance. CAM does not apply; unit is uncontrolled for all pollutants.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	condition) 3.6 lbsNOx/hr and 15.8 tons NOx/yr 4.2 lbs carbon monoxide (CO)/hr 18.4 tons CO/yr 0.55 lb organic compounds (OC)/hr and 2.41 tons/yr Visible PE shall not exceed 5% opacity, as a 6-minute average.												
P002 P003 P040 P051	None	17-11(B)		Y									ND: The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P002 P003 P051	None	17-07(A)		Y									ND: The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P003	0.21 lbs particulate emissions (PE) /hr and 0.79 ton PE/yr 0.07 lb sulfur dioxide (SO2)/hr 0.25 ton SO2/yr 9.41 lbs carbon monoxide (CO)/hr 35.0 tons CO/yr	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) OR: The permittee shall burn only natural gas ET: M,R,Rp are sufficient to demonstrate compliance. CAM does not apply; unit is uncontrolled for all pollutants.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	1.23 lb Organic Compounds (OC)/hr and 4.59 tons/yr Visible PE shall not exceed 5% opacity, as a 6-minute average.												
P003	7.62 lbsNOx/hr	N	Y	N	Y	Y	N	Y	Y	Y	N	N	Basis: OAC rule 3745-31-05(A)(3) OR: The permittee shall burn only natural gas CAM does not apply; unit is uncontrolled.
P003	0.068 lbs NOX/mmbtu	110-03(P)	N	N	Y	Y	N	Y	Y	Y	N	N	OR: The permittee shall burn only natural gas CAM does not apply; unit is uncontrolled.
P003	NOx emissions shall not exceed 28.33 tons per rolling, 12-month period	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(D) OR: The maximum annual natural gas fuel usage for this emissions unit shall not exceed 817 mmcf, based upon a rolling, 12-month summation of natural gas fuel usage.
P003	None	18-06(E)		Y									ND: The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P035	0.11 lb nitrogen oxides (NOx)/mmBtu heat input	110-03(J)	N	N	Y	Y	N	Y	Y	Y	N	N	OR: The permittee shall burn only natural gas CAM does not apply, unit is uncontrolled
P035 P036 P037 P039 P049 P050	NONE	17-11(B)	N	Y									ND: The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.
P035 P036	NONE	17-07(A)	N	Y									ND: exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P037 P039 P049 P050													3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
P035 P036 P037 P039	1.98 LBS SO2/mmbtu of actual heat input	18-53(D)(4)	N	N	Y	Y	N	Y	Y	N	N	N	OR: The permitte shall burn only natural gas. ET: M,R,Rp are sufficient to demonstrate compliance because natural gas combustion is the only source of SO2 emissions from this source. This emissions unit is subject to the requirements of OAC rule 3745-18-53(D) because Republic Engineered Products, Inc." (OEPA premise number 0247080229) split into two companies. US Steel owns and operates the tube mill side of this plant. Those furnaces (P035, P036, P037 and P039) listed in OAC 3745-18-53(D)(4) and OAC 3745-18-53(D)(6) belong to US Steel. Seamless rotary furnace number 4 (OEPA source number P029) in OAC 3745-18-53(D)(6) and Seamless rotary furnace number 4 in OAC 3745-18-53(D)(4) are the same emissions unit (P039). There's a typo in the rule. P039 is the correct ID.
P037	0.15 lb nitrogen oxides (NOx)/mmBtu heat input	N	Y	N	Y	Y	N	Y	Y	Y	N	N	Basis: OAC rule 3745-31-05(A)(3) OR: The permittee shall burn only natural gas CAM does not apply, unit is uncontrolled
P037	0.15 lb nitrogen oxides (NOx)/mmBtu heat input	110-03(P)	N	Y									ND: The emission limitation established by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P039	0.055 lb nitrogen oxides (NOx)/mmBtu heat input	110-03(J)	N	N	Y	Y	N	Y	Y	Y	N	N	OR: The permittee shall burn only natural gas CAM does not apply, unit is uncontrolled
P039	178 lbs SO2/hr	18-53(D)(6)	N	N	Y	Y	N	Y	Y	N	N	N	OR: The permitte shall burn only natural gas.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													ET: M,R,Rp are sufficient to demonstrate compliance because natural gas combustion is the only source of SO2 emissions from this source. This emissions unit is subject to the requirements of OAC rule 3745-18-53(D) because Republic Engineered Products, Inc." (OEPA premise number 0247080229) split into two companies. US Steel owns and operates the tube mill side of this plant. Those furnaces (P035, P036, P037 and P039) listed in OAC 3745-18-53(D)(4) and OAC 3745-18-53(D)(6) belong to US Steel. Seamless rotary furnace number 4 (OEPA source number P029) in OAC 3745-18-53(D)(6) and Seamless rotary furnace number 4 in OAC 3745-18-53(D)(4) are the same emissions unit (P039). There's a typo in the rule. P039 is the correct ID.
P040	0.36 lb particulate emissions (PE) /hr 0.03 lb sulfur dioxide (SO2)/hr 7.64 lbs nitrogen oxides (NOx)/hr 4.19 lbs carbon monoxide (CO)/hr 0.27 lb organic compounds (OC)/hr	N	Y										Basis: OAC rule 3745-31-05(A)(3) OR: The permittee shall burn only natural gas ET: M,R,Rp are sufficient to demonstrate compliance. CAM does not apply; unit is uncontrolled for all pollutants.
P040	0.15 lb nitrogen oxides (NOx)/mmBtu heat input	110-03(P)	N	N	Y	Y	N	Y	Y	Y	N	N	OR: The permittee shall burn only natural gas CAM does not apply, unit is uncontrolled
P040	1.98 LBS SO2/mmbtu of	18-53(D)(4)	N	Y									ND: The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	actual heat input												OAC rule 3745-31-05(A)(3).
P040	20% opacity	17-07(A)	N	N	Y	Y	N	Y	Y	N	N	N	OR: The permittee shall burn only natural gas ET: M,R,Rp are sufficient to demonstrate compliance.
P048	13.4 lbs PE/hr	17-11(B)	N	N	N	Y	N	Y	Y	N	N	N	ET: M,R,Rp are sufficient to demonstrate compliance. CAM does apply; UMRE is above 100 tpy.
P049	Nitrogen oxides (NOx) emissions shall not exceed 0.08 lb/mmBtu (as measured at the maximum firing condition) and 21.86 tons/yr. Carbon monoxide (CO) emissions shall not exceed 5.14 lbs/hr and 22.51 tons/yr	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) OR: The permittee shall burn only natural gas ET: M,R,Rp are sufficient to demonstrate compliance. CAM does not apply, unit is uncontrolled for all pollutants.
P049	Particulate emissions (PE) shall not exceed 0.46 lb/hr and 2.04 tons/yr. Sulfur dioxide (SO2) emissions shall not exceed 0.037 lb/hr and 0.16 tons/yr. Organic compounds (OC) emissions shall not exceed 0.67 lb/hr and 2.95 tons/yr.	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3), as effective 11/30/01 OR: The permittee shall burn only natural gas ET: M,R,Rp are sufficient to demonstrate compliance. CAM does not apply, unit is uncontrolled for all pollutants.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P049 P050	None	N	Y	Y									Basis: OAC rule 3745-31-05(A)(3), as effective 12/01/06 This rule paragraph 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 Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO2 and OC from this air contaminant source since the uncontrolled potential to emit for PE, SO2 and OC is less than 10 tons/yr.
P049 P050	762 lbs SO2/hr	18-06(E)(2)	N	N	Y	Y	N	Y	Y	N	N	N	OR: The permittee shall burn only natural gas ET: M,R,Rp are sufficient to demonstrate compliance. The potential SO2 emissions from this emissions unit are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO2 emissions).
P050	Nitrogen oxides (NOx) emissions shall not exceed 0.08 lb/mmBtu (as measured at the maximum firing condition) and 11.91 tons/yr. Carbon monoxide (CO) emissions shall not exceed 2.80 lbs/hr and 12.26 tons/yr	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3) OR: The permittee shall burn only natural gas ET: M,R,Rp are sufficient to demonstrate compliance. CAM does not apply, unit is uncontrolled for all pollutants.
P049	Particulate emissions (PE) shall not exceed 0.25 lb/hr and 1.11 tons/yr. Sulfur dioxide (SO2) emissions shall not exceed	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3), as effective 11/30/01 OR: The permittee shall burn only natural gas ET: M,R,Rp are sufficient to demonstrate compliance. CAM does not apply, unit is uncontrolled for all pollutants.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	0.02 lb/hr and 0.09 tons/yr. Organic compounds (OC) emissions shall not exceed 0.37 lb/hr and 1.61 tons/yr.												
P051	PE: 1.4 lbs/hr and 6.14 tpy 10% opacity	N	Y	N	Y	Y	N	Y	Y	N	N	N	Basis: OAC rule 3745-31-05(A)(3), as effective 11/01/01 OR: (1) The permittee shall maintain an average total dissolved solids (TDS) concentration of the cooling water less than or equal to 3,500 lbs TDS per 1,000,000 lbs water (3,500 ppm). ET: M,R,Rp are sufficient to demonstrate compliance CAM does not apply, UMRE is less than 100 tpy.
P051	None	N	Y	Y									Basis: OAC rule 3745-31-05(A)(3), as effective 12/01/06 This rule paragraph 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 Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the uncontrolled potential to emit for PE is less than 10 tons/yr.
P051	None	N	Y	Y	Y	Y	N	Y	Y	N	N	N	Basis: 40 CFR Part 63 Subpart Q OR: The permittee shall not use chromium-based water treatment chemicals in this emissions unit.
K003 K005 K006	VOC: 3.75 lbs/gal of coating	N	Y	N	Y	Y	N	Y	Y	N	Y	N	Basis: OAC rule 3745-31-05(A)(3) OR: annual coating usage restrictions ET: M,R,Rp are sufficient to demonstrate compliance St: Reporting requirements streamlined to conform with currently acceptable reporting requirements. CAM does not apply, unit is uncontrolled.
K003	None	21-09(U)(1)(a)	N	Y									ND: The emission limitation specified by this rule is less

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
K005 K006													stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
K003 K005 K006 and all stencilin g units .	None	N	40 CFR part 63, Subpart MMMM	Y									ND: Only non-HAP coatings in use prior the effective date of the rule.

DRAFT

Division of Air Pollution Control
Title V Permit
for
Lorain Tubular Company LLC

Facility ID:	0247080961
Permit Number:	P0110998
Permit Type:	Renewal
Issued:	10/30/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Lorain Tubular Company LLC

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Authorization

Facility ID:	0247080961
Facility Description:	Steel plant
Application Number(s):	A0045480, A0051832
Permit Number:	P0110998
Permit Description:	Renewal Title V operating permit for a steel plant.
Permit Type:	Renewal
Issue Date:	10/30/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0085449

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

Lorain Tubular Company LLC
2199 E. 28th Street
Lorain, OH 44055

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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, Northeast 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
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, Northeast 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, Northeast 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, Northeast 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

Officialthat, 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, Northeast 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, Northeast 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, Northeast 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, Northeast 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 RequirementsUnder 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, Northeast 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, Northeast 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 RequirementsUnder 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, Northeast 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, Northeast 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, Northeast 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. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #49, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

   [Authority for term: OAC rule 3745-77-07(C)(1)]

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

EU ID	Operations, Property and/or Equipment Description
P060	119KW generator
P061	Firewater System Diesel Fire Pump
P062	NG engine for the Security Guard House

   [Authority for term: 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 3745-17, 3745-18, 3745-21, 3745-31 and/or 40 CFR Part 60 or 63:

EU ID	Operations, Property and/or Equipment Description
F002	Storage Piles
F004	Storage Piles PTI: 02-15543
G001	GDF PTI: 02-17106
K009	#6 Q&T - Stencil Unit
K010	#6 Q&T - EMI-UT
K011	#6 Q&T - PMC-CSO
K012	#6 Q&T - Weight Measure Line Marker
K013	3SM - #3 North Task Stencil Unit
K014	3SM - #3 South Task Stencil Unit
K015	4SM - #1 Batch Saw Stencil Unit
K016	4SM - #2 Batch Saw Stencil Unit
K017	4SM - #2 Cutoff - #3 Head Stencil Unit
K018	4SM - # 2 Cutoff - #4 Head Stencil Unit
K019	4SM - #1 Stencil Unit
K020	4SM - #1 Stencil Unit
K021	3SM - Amalog East Marking Unit

EU ID	Operations, Property and/or Equipment Description
K022	3SM - Amalog Middle Marking Unit
K023	3SM - Amalog West Marking Unit
K024	3SM - Tuboscope Northeast Marking Unit
K025	3SM - Tuboscope Northwest Marking Unit
K026	3SM - Tuboscope Southeast Marking Unit
K027	3SM - Tuboscope Southwest Marking Unit
K028	4SM - Tuboscope North Marking Unit
K029	4SM - Tuboscope South Marking Unit
K030	Manual Spray Painting
K031	3SM - DAPCO Unit
L005	3SMLS Parts Cleaner Die & Tool Column MW2
L006	3 SMLS Parts Cleaner Stop 625a
L007	3SMLS Parts Cleaner Stop 666b
L008	3 SMLS Parts Cleaner Stop 629
L012	3SMLS Parts Cleaner Stop 627
L014	3SMLS Parts Cleaner Stop 615
L019	4SMLS Parts Cleaner Annex Shop N Stop 504
L020	4SMLS Parts Cleaner 4SM Maint Stop 500
L025	3SMLS Parts Cleaner Stop 615
L028	3SMLS Parts Cleaner Stop 625a
L030	4SMLS Parts Cleaner Annex Shop N
L034	4SMLS Parts Cleaner Annex Shop N
L037	3SMLS Parts Cleaner Stop 629b
L040	3SMLS Parts Cleaner- Stop 615
L041	3SMLS Parts Cleaner Stop 625a
L042	3SMLS Parts Cleaner - Stop 615
L043	3SMLS Parts Cleaner - Stop 663
L044	4SMLS Parts Cleaner - Stop 625a
L045	3SMLS Parts Cleaner - Stop 627
L046	3SMLS Parts Cleaner - Stop 627
L047	3SMLS Parts Cleaner - Stop 628
P052	#3 Q&T Quench Water Cooling Tower PTI: P0116735

[Authority for term: OAC rule 3745-77-07(A)(13)]

5. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines): P060 and P061. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR Part 63, Subpart ZZZZ)

6. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts JJJJ and A, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (NSPS): P P062. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

(Authority for term: 40 CFR Part 60)

C. Emissions Unit Terms and Conditions

1. F001, Roadways & Parking Lots

Operations, Property and/or Equipment Description:

Roadways & 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 3745-17-07(B)(8)(a)	Visible particulate emissions from any paved roadways and parking areas shall not exceed 10% opacity. See section b)(2)k.
b.	OAC rule 3745-17-08(B)(8)-(B)(9)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections b)(2)c., b)(2)d., and b)(2)f. through b)(2)j.)
unpaved roadways and parking areas		
c.	OAC rule 3745-17-08(B)(8)(a)	Visible particulate emissions from any unpaved roadways and parking areas shall not exceed 10% opacity. See section b)(2)k.
d.	OAC rule 3745-17-08(B)(8)-(B)(9)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections b)(2)e. through b)(2)j.)

(2) Additional Terms and Conditions

a. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Paved roadways:	One-way mileage (approx.)
Grove St. entrance road (VT001)	0.10
Grove St. to #4 Seamless (VT002)	0.75
#4 Seamless to NW boundary access road (VT003)	0.15
NW boundary access road (VT004)	0.10
NW boundary access road to coil warehouse (VT005)	0.30
Access Road East of Coil Warehouse (VT005A)	0.10
Charleston access road to #3 Seamless East (VT007)	0.40
Charleston St. access road (VT008)	0.25
Grove St. to Charleston access road (VT009)	0.25
South plant side access road to north plant side access road (VT010)	0.40
From segment #10 to #3 Seamless east (VT011)	0.25
Gary Avenue to Grove Street Truck Gate (VT013A)	0.20
Gantry crane pipe loading (VT015)	1.20
Seamless pipe loading (VT016)	0.30
Lagoon and D2 Access Road (VT019A)	0.10
#3 Hot and Maintenance Parking (VT020)	0.10
ERW Parking (VT021)	0.10
#3 Smls Office Parking (VT029)	0.10

Paved parking areas:	One-way mileage (approx.)
Grove St. parking lot (VT013)	0.30
Main Office parking lot (VT014)	0.10

b. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Unpaved roadways:	One-way mileage (approx.)
North plant side access road (VT006)	0.60
Charleston St. access road (VT008a)	0.05
Access road to 4 seasons trailer (VT012)	0.15
Pipe warehouse truck road (VT017)	0.10
Bar coil warehouse truck road (VT018)	0.20
Lagoon and D-2 access road (VT019)	0.25

Unpaved parking areas:	One-way mileage (approx.)
#4 Office Parking (VT022)	0.10
Gantry Parking VT023:	0.10
#3 Hot and Maintenance Parking (VT024)	0.10
#3 Hot and Maintenance Parking (VT025)	0.10
#3 Finishing Parking (VT026)	0.10

D&T, TCM Parking (VT027)	0.10
#4 Finishing Parking (VT028)	0.10
#3 Smls Office Parking (VT029)	0.10

c. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee has committed to treat the paved roadways and parking areas by employing the different control measures mentioned in OAC rule 3745-17-08(B) at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways 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 shoulders of all paved roadways with suitable dust suppressant chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

e. The permittee shall employ reasonably available control measures on all unpaved roadways and parking 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 and parking areas with suitable dust suppressant chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

f. 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.

g. 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.

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

i. 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

j. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

k. The emission limitation and rule citation reflect the settlement agreement reached between Ohio EPA and the iron and steel production facilities concerning the iron and steel facilities' appeal to the Ohio Environmental Review Appeals Commission of the 1991 revisions and additions to OAC Chapter 3745-17. The revised rule containing the limitation and rule citation was adopted by the Director of Ohio EPA in December, 1997. The USEPA and the iron and steel production faclities have agreed to consider the emission limitation and rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the limitation and rule citation as a revision to the Ohio SIP for particulate matter.

c) Operational Restrictions

(1) When a dust suppressant is used for controlling fugitive dust from the unpaved road segments and parking areas, the following restrictions apply:

a. the permittee shall certify or possess certification that all dust suppressants used to control fugitive dust meet the PCB limitations set forth in 40 CFR 761, and that there are no listed hazardous wastes or characteristic hazardous wastes as set forth in 40 CFR 261;

b. the permittee shall not apply used oil as defined by OAC rule 3745-279-01(A)(12) as a dust suppressant; and

c. the dust suppressant shall be applied in such a manner as to prevent pollution of waters of the State as required by the Ohio Revised Code, section 6111.

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

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. all paved roadways: minimum inspection frequency – weekly;

b. all paved parking/storage areas: minimum inspection frequency – weekly;

c. all unpaved roadways: minimum inspection frequency – weekly; and

d. all unpaved storage areas: minimum inspection frequency - weekly.

[Authority for term: 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.

[Authority for term: 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(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.

[Authority for term: 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.

[Authority for term: 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. Emission Limitation:

Visible particulate emissions from any paved and unpaved roadways and parking areas shall not exceed 10% opacity.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(3), or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. P002, No. 3 Smls Q & T Austenitizing Furnace

Operations, Property and/or Equipment Description:

50 mmBtu/hr Quench and Temper heat-treat line Austenitizing 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)(3) (PTI 02-15543, issued 10/30/07)	Nitrogen oxides (NO_x) emissions shall not exceed 0.072 lb/mmBtu of actual heat input (as measured at the maximum firing condition). Nitrogen oxides (NO_x) emissions shall not exceed 3.6 lbs/hr and 15.8 tpy. Carbon monoxide (CO) emissions shall not exceed 4.2 lbs/hr and 18.4 tpy. Particulate emissions (PE) shall not exceed 0.10 lb/hr and 0.42 tpy. Sulfur dioxide (SO_2) emissions shall not exceed 0.03 lb/hr and 0.13 tpy. Organic compound (OC) emissions shall not exceed 0.55 lb/hr and 2.41 tpy. Visible PE shall not exceed 5% opacity, as a 6-minute average.
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	See b)(2)a.
d.	OAC rule 3745-18-06	See b)(2)a.

(2) Additional Terms and Conditions

a. The emission limitation required by this applicable 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-15543]

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.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-15543]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

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>:

NO_x emissions shall not exceed 0.072 lb/mmBtu of actual heat input (as measured at the maximum firing condition).

NO_x emissions shall not exceed 3.6 lbs/hr and 15.8 tpy.

<u>Applicable Compliance Methods</u>:

Compliance with the short-term NO_x emission limitations has been demonstrated based upon previous emission testing conducted on this emissions unit. If required, compliance shall be demonstrated based upon additional emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7 or other USEPA-approved test methods with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable NO_x emission limitation (3.6 lbs/hr) by the maximum annual hours of

operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

b. Emission Limitations:

CO emissions shall not exceed 4.2 lbs/hr and 18.4 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly CO emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 84 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10 or other USEPA-approved test method with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable CO emission limitation (4.2 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

c. Emission Limitations:

PE shall not exceed 0.10 lb/hr and 0.42 tpy.

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 1.9 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (0.10 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

d. Emission Limitations:

SO_2 emissions shall not exceed 0.03 lb/hr and 0.13 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly SO2 emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 0.6 lb/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly SO_2 emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6 and OAC rule 3745-18-04 or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable SO_2 emission limitation (0.03 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

e. Emission Limitations:

OC emissions shall not exceed 0.55 lb/hr and 2.41 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly OC emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 11 lb/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 25 or 25A, as appropriate. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and USEPA guidance documents. Alternative USEPA-approved test methods may be used with prior approval from Ohio EPA.

The tpy emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.55 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

f. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1) or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

g) Miscellaneous Requirements

(1) None.

3. P003, No. 3 Smls Q & T Tempering Furnace

Operations, Property and/or Equipment Description:

112 mmBtu/hr Quench and Temper heat-treat line Tempering 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(D) (PTI 02-15543, issued 10/30/07)	Nitrogen oxides (NO_x) emissions shall not exceed 28.33 tons per rolling, 12-month period.
b.	OAC rule 3745-31-05(A)(3) (PTI 02-15543, issued 10/30/07)	NO_x emissions shall not exceed 7.62 lbs/hr. Carbon monoxide (CO) emissions shall not exceed 9.41 lbs/hr and 35.0 tpy. Particulate emissions (PE) shall not exceed 0.21 lb/hr and 0.79 tpy. Sulfur dioxide (SO_2) emissions shall not exceed 0.07 lb/hr and 0.25 tpy. Organic compound (OC) emissions shall not exceed 1.23 lbs/hr and 4.59 tpy. Visible PE shall not exceed 5% opacity, as a 6-minute average.
c.	OAC rule 3745-17-11(B)	See b)(2)a.
d.	OAC rule 3745-17-07(A)	See b)(2)a.
e.	OAC rule 3745-18-06(E)	See b)(2)a.
f.	OAC rule 3745-110-03(P)	NO_x emissions shall not exceed 0.068 lb/mmBtu of actual heat input (as measured at the maximum firing condition).

(2) Additional Terms and Conditions

a. The emission limitation required by this applicable 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-15543]

(2) The maximum annual natural gas fuel usage for this emissions unit shall not exceed 817 mmcf, based upon a rolling, 12-month summation of natural gas fuel usage.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-15543]

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.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-15543]

(2) The permittee shall maintain monthly records of the following information:

a. the natural gas usage for each month; and

b. the rolling, 12-month summation of the natural gas usage.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

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

a. anyexceedances of the natural gas usage restriction specified in term c)(2).

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing on this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted approximately 6 months prior to the expiration of this permit.

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

i. NO_x emissions shall not exceed 0.068 lb/mmBtu of actual heat input (as measured at the maximum firing condition); and

ii. NO_x emissions shall not exceed 7.62 lbs/hr.

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

i. forNOx, Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A.

d. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA, NEDO.

e. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Ohio EPA, NEDO. 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.

f. 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, NEDO. 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, NEDO's refusal to accept the results of the emission test(s).

g. Personnel from the Ohio EPA, NEDO 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.

h. 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, NEDO 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, NEDO.

[Authority for term: 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:

NO_x emissions shall not exceed 0.068 lb/mmBtu of actual heat input (as measured at the maximum firing condition).

NO_x emissions shall not exceed 7.62 lbs/hr.

Applicable Compliance Methods:

Compliance with the short-term NO_x emission limitations shall be demonstrated in accordance with the test methods and procedures specified in condition f)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

b. Emission Limitations:

NO_x emissions shall not exceed 28.33 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance shall be demonstrated by multiplying the results of the most recent emission test (lb/mmBtu) by the actual natural gas usage (mmcf per rolling, 12-month period) from d)(2) and by 1020 Btu/cf, and then dividing by 2,000 lbs/ton.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

c. Emission Limitations:

CO emissions shall not exceed 9.41 lbs/hr and 35.0 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly CO emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 84 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10 or other USEPA-approved test methods with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the annual natural gas consumption rate of 817 mmcuft by 84 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version) and dividing by 2000 lbs/ton. The annual natural gas consumption rate of 817 mmcuft is a restricted amount and is listed as an operational restriction in c)(2). Therefore, provided compliance is shown with the restricted annual natural gas consumption rate of 817 mmcuft through records required in d)(2) and reporting in e)(2), compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

d. Emission Limitations:

PE shall not exceed 0.21 lb/hr and 0.79 tpy.

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 1.9 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly PE emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the annual natural gas consumption rate of 817 mmcuft by 1.9 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version) and dividing by 2000 lbs/ton. The annual natural gas consumption rate of 817 mmcuft is a restricted amount and is listed as an operational restriction in c)(2). Therefore, provided compliance is shown with the restricted annual natural gas consumption rate of 817 mmcuft through records required in d)(2) and reporting in e)(2),.compliance is demonstrated with the annual emission limitation

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

e. Emission Limitations:

SO_2 emissions shall not exceed 0.07 lb/hr and 0.25 tpy.

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly SO2 emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 0.6 lb/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly SO2 emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1

through 4 and Method 6 and OAC rule 3745-18-04, or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the annual natural gas consumption rate of 817 mmcuft by 0.6 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version) and dividing by 2000 lbs/ton. The annual natural gas consumption rate of 817 mmcuft is a restricted amount and is listed as an operational restriction in c)(2). Therefore, provided compliance is shown with the restricted annual natural gas consumption rate of 817 mmcuft through records required in d)(2) and reporting in e)(2), compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

f. Emission Limitations:

OC emissions shall not exceed 1.23 lbs/hr and 4.59 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly OC emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 11 lb/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 25 or 25A, as appropriate. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and USEPA guidance documents. Alternative USEPA-approved test methods may be used with prior approval from Ohio EPA.

The annual emission limitation was developed by multiplying the annual natural gas consumption rate of 817 mmcuft by 11 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version) and dividing by 2000 lbs/ton. The annual natural gas consumption rate of 817 mmcuft is a restricted amount and is listed as an operational restriction in c)(2). Therefore, provided compliance is shown with the restricted annual natural gas consumption rate of 817 mmcuft through records required in d)(2) and reporting in e)(2), compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

g. Emission Limitation:

Visible PE shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and

procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1); or other USEPA-approved test method, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

g) Miscellaneous Requirements

(1) None.

4. P035, No. 3 Seamless Mill Rotary Furnace

Operations, Property and/or Equipment Description:

296 mmBtu/hr Natural Gas Fired Rotary 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 3745-110-03(J)	Nitrogen oxides (NO_x) emissions shall not exceed 0.11 lb/mmBtu of actual heat input. See b)(2)a and b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)d.
d.	OAC rule 3745-18-53(D)(4)	Sulfur dioxide (SO_2) emissions shall not exceed 1.98 lbs/mmBtu of actual heat input. See b)(2)e.

(2) Additional Terms and Conditions

a. Emissions unit P035 has a maximum heat input capacity rating of 296 mmBtu/hr, however, the furnace does not operate at this rate due to current product specifications. Historical production records and subsequent emissions testing indicate that the emissions unit operates at or near an average heat input capacity value of 89 mmBtu/hr.

Therefore, for the purpose of this permit, emissions unit P035 is assigned a nominal heat input rate of 89 mmBtu/hr (as specified above) during normal operations and allocated a 20% buffer, for a total nominal rated heat input of 106.8 mmBtu/hr. As described in more detail below, the initial calculation of a heat input rate by this emissions unit that is greater than 106.8 mmBtu/hr (based on a 3-hour rolling heat input rate average, excluding startup, shutdown, and malfunction values), shall require an additional NO_x emissions test at, or above,

such measured heat input rate in order to determine if the applicable NO_x emission limitation specified for this emissions unit has been exceeded.

Operation of this source at a heat input rate greater than 106.8 mmBtu/hr (based on a 3-hour rolling heat input rate average excluding startup, shutdown, and malfunction values) does not constitute a violation, however, any operation of this source at a heat input rate greater than 106.8 mmBtu/hr (based on a 3-hour rolling heat input rate average excluding startup, shutdown, and malfunction values), will require additional NO_x emissions testing at, or above, this calculated heat input rate in order to determine if the applicable NO_x emission limitation has been exceeded, which may result in a mass emissions violation (see additional testing requirements for this emissions unit).

Note: The site-specific 20% buffer allocated for this source in determining the total heat input rating accounts for an acceptable variation in operating loads and parameters due to product specifications. Of particular concern is the variation in the furnace temperature due to the prescribed heat input amounts required during production of specific product grades and the potential impacts on furnace operational throughput from upstream and downstream units. These temperature variations can create non-steady state conditions inside the furnace causing the burners to fire only required amounts of natural gas necessary to maintain temperature stability and operational efficiency during production. Operation of this unit within the 20% range is not expected contribute to a NO_x emission increase.

b. The NO_x emission rate for this emissions unit (0.11 lb/mmBtu) was established using the results of NO_x emissions testing conducted in March, 2010 and March 2011 (The average of 3, 1-hour run NO_x emission average for each test), plus a 20% buffer. The average NO_x emissions from these emission tests were determined to be 0.091 lb/mmBtu**. [0.091 + 20% = 0.11 lb/mmBtu].** The average calculated heat input rate during these tests runs was determined to be 89 mmBtu/hr.

c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

e. The potential SO_2 emissions from this emissions unit are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO_2 emissions).

c) Operational Restrictions

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

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

d) Monitoring and/or Record Keeping Requirements

(1) The permittee shall maintain records of the 3-hour rolling heat input rate average for this emissions unit. The heat input rate shall be calculated as follows:

Natural gas fuel used (ft^3/hr)] x [1,020 Btu/ft^3 of natural gas/10^6] = Heat Input, mmBtu/hr

[Authority for term: OAC rule 3745-77-07(C)(1)]

(2) For each occurrence where the 3-hour rolling heat input rate average is higher than 106.8 MMBtu/hr (or any subsequent higher heat input value for which compliance has been demonstrated) the permittee shall maintain records of the following:

a. the calculated 3-hour heat input rate average that exceeded the applicable limit;

b. the hourly throughput rate of the steel billets (tons/hour); and

c. the product specification of the steel billets processed during this 3-hour period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(3) 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) No later than 60 days after any 3-hour rolling heat input rate average is above the heat input testing threshold (106.8 MMBtu/hr), or any subsequent higher heat input value for which compliance has been demonstrated, the permittee shall submit a report to Ohio EPA, NEDO that specifies the calculated 3-hour rolling heat input rate average for this emissions unit (excluding startup, shutdown, and malfunction values). This report shall specify what the 3-hour rolling heat input rate average was calculated to be, the hourly throughput rate of the steel billets (tons/hour), and product specification of the steel billets processed during this 3-hour period.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-03(J)]

(2) The permittee shall summarize in an <u>annual</u> report each occurrence that the 3-hour rolling heat input rate average exceeded the 106.8 MMBtu/hr (or any subsequent higher heat input value for which compliance has been demonstrated) heat input threshold and what the 3-hour rolling heat input average was determined to be for each occurrence. In

addition, the permittee shall identify in the annual report the status of conducting further emissions testing, if so required, by the terms and conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-03(J)]

(3) 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.

[Authority for term: 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. Emission Limitation:

NO_x emissions shall not exceed 0.11 lb/mmBtu of actual heat input.

Applicable Compliance Methods:

If required, the permittee shall demonstrate compliance with the NO_x emission limitation in accordance with the test methods and procedures specified in Method 7, 7a, 7c, 7d, or 7e of 40 CFR Part 60, Appendix A, and any additional approved USEPA methods, as applicable. Compliance with the heat input threshold shall be demonstrated by following the requirements specified in the monitoring and record keeping requirements, and reporting requirements contained in this permit.

Operation of this source at a heat input rate greater than 106.8 mmBtu/hr (based on a 3-hour rolling heat input rate average excluding startup, shutdown, and malfunction values) does not constitute a violation, however, any operation of this source at a heat input rate greater than 106.8 mmBtu/hr (based on a 3-hour rolling heat input rate average excluding startup, shutdown, and malfunction values) will require additional NO_x emissions testing at, or above, this calculated heat input rate in order to determine if the applicable NO_x emission limitation has been exceeded.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-03(J)]

b. Emission Limitation:

SO_2 emissions shall not exceed 1.98 lbs/mmBtu of actual heat input.

Applicable Compliance Methods:

If required, the permittee shall demonstrate compliance with the SO_2 emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4

and Method 6 and OAC rule 3745-18-04, or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

(2) The permittee shall schedule the NO_x emissions test within 60 days of any heat input rate greater than 106.8 mmBtu/hr (based on a 3-hour rolling heat input rate average excluding startup, shutdown, and malfunction values) or any subsequent higher heat input value for which compliance has been demonstrated in order to show compliance with the applicable NO_x emission limitation.

Additional NO_x emissions testing shall be performed at any time the furnace is operated at a rate (based on a 3-hour rolling heat input rate average, excluding startup, shutdown, and malfunction values) which is 20% above the highest heat input rate at which compliance has been demonstrated with the applicable NO_x emission limitation <u>and to establish a higher rate range for which the unit is allowed to operate that shows compliance with the applicable NO_x emission limitation.</u>

NO_x emissions testing shall be conducted in accordance with the test methods and procedures specified in Method 7, 7a, 7c, 7d or 7e of 40 CFR Part 60, Appendix A, and any additional USEPA-approved methods, as applicable.

The results of subsequent NO_x emissions testing shall be submitted to the Ohio EPA, NEDO within 60 days of completion.

The permittee may seek an extension to conduct the NO_x emissions test. The extension request shall provide sufficient demonstration by the permittee that production orders for this emissions unit within the allotted emission testing timeframe would not allow the furnace to operate at the required higher heat input rate to demonstrate compliance with the applicable NO_x emission limitation.

The request for an extension shall be submitted to Ohio EPA, NEDO, in writing, within 45 days of the report's submission.

Note: Product specification largely dictates heat input values. Products runs are order dependent and, therefore, the time lapse between identical products runs may exceed the retesting timelines prescribed in this section. A particular product run may increase heat input to an extent that the retesting threshold is surpassed. However, it may not be known to the permittee at the time if a similar product run will occur within the allotted timeframe. Accordingly, the permittee may seek an extension to retest until a product requiring similar heat inputs is scheduled to be run.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

5. P036, No. 3 Seamless Mill No. 1 Reheat Furnace

Operations, Property and/or Equipment Description:

30.8 mmBtu/hr Natural Gas Fired Reheat 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 t the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 02-7768, issued 7/26/95)	Nitrogen oxides (NO_x) emissions shall not exceed 0.15 lb/mmBtu of actual heat input (as measured at the maximum firing condition).
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 3745-18-53(D)(4)	Sulfur dioxide (SO_2) emissions shall not exceed 1.98 lbs/mmBtu of actual heat input. See b)(2)c.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

c. The potential SO_2 emissions from this emissions unit are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO_2 emissions).

c) Operational Restrictions

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

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

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.

[Authority for term: 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.

[Authority for term: 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. Emission Limitations:

NO_x emissions shall not exceed 0.15 lb/mmBtu of actual heat input (as measured at the maximum firing condition).

Applicable Compliance Methods:

Compliance with the NO_x emission limitation has been demonstrated based upon previous emission testing conducted on this emissions unit. If required, compliance shall be demonstrated based upon additional emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

1.98 lbs SO2/mmBtu of actual heat input

Applicable Compliance Methods:

If required, the permittee shall demonstrate compliance with the SO_2 emission limitation through emission testing performed in accordance with the emthodsand

procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6 and OAC rule 3745-18-04, or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

g) Miscellaneous Requirements

(1) None.

6. P037, No. 3 Seamless Mill No. 2 Reheat Furnace

Operations, Property and/or Equipment Description:

58.8 mmBtu/hr Natural Gas Fired Reheat 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)(3) (PTI 02-7768, issued 7/26/95)	Nitrogen oxides (NO_x) emissions shall not exceed 0.15 lb/mmBtu of actual heat input (as measured at the maximum firing condition).
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 3745-18-53(D)(4)	Sulfur dioxide (SO_2) emissions shall not exceed 1.98 lbs/mmBtu of actual heat input. See b)(2)c.
e.	OAC rule 3745-110-03(P)	See b)(2)d.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

c. The potential SO_2 emissions from this emissions unit are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO_2 emissions).

d. The emission limitation established by this rule is equivalent to 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.

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

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.

[Authority for term: 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing on this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months prior to the expiration of this permit.

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

i. NO_x emissions shall not exceed 0.15 lb/mmBtu of actual heat input (as measured at the maximum firing condition).

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

i. forNO_x, Method 7 of 40 CFR Part 60, Appendix A.

d. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA, NEDO.

e. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Ohio EPA, NEDO. 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.

f. 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, NEDO. 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, NEDO's refusal to accept the results of the emission test(s).

g. Personnel from the Ohio EPA, NEDO 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.

h. 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, NEDO 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, NEDO.

[Authority for term: 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. <u>Emission Limitation</u>:

NO_x emissions shall not exceed 0.15 lb/mmBtu of actual heat input (as measured at the maximum firing condition).

<u>Applicable Compliance Method</u>:

The permittee shall demonstrate compliance with the NO_x emission limitation in accordance with the test methods and procedures specified in f)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

SO_2 emissions shall not exceed 1.98 lbs/mmBtu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the SO_2 emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6 and OAC rule 3745-18-04, or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

g) Miscellaneous Requirements

(1) None.

7. P039, No. 4 Seamless Mill Rotary Furnace

Operations, Property and/or Equipment Description:

195.4 MMBtu/hr Natural Gas Fired Rotary 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 3745-110-03(J)	Nitrogen oxides (NO_x) emissions shall not exceed 0.055 lb/mmBtu of actual heat input. See b)(2)a and b)(2)b.
b.	OAC rule 3745-17-11(B)	See b)(2)c.
c.	OAC rule 3745-17-07(A)	See b)(2)d.
d.	OAC rule 3745-18-53(D)(4)	Sulfur dioxide (SO_2) emissions shall not exceed 1.98 lbs/mmBtu of actual heat input. See b)(2)e.
e.	OAC rule 3745-18-53(D)(6)	SO_2 emissions shall not exceed 178 lbs/hr. See b)(2)e.

(2) Additional Terms and Conditions

a. Emissions unit P039 has a maximum heat input capacity rating of 195.4 mmBtu/hr, however, the furnace does not operate at this rate due to current product specifications. Historical production records and subsequent emissions testing indicate that the emissions unit operates at or near an average heat input capacity value of 108.0 mmBtu/hr.

Therefore, for the purpose of this permit, emissions unit P039 is assigned a nominal heat input rate of 108.0 mmBtu/hr (as specified above) during normal operations and allocated a 20% buffer, for a total nominal rated heat input of

129.6 mmBtu/hr. As described in more detail below, the initial calculation of a heat input rate by this emissions unit that is greater than 129.6 mmBtu/hr (based on a 3-hour rolling heat input rate average, excluding startup, shutdown, and malfunction values), shall require an additional NO_x emissions test at, or above, such measured heat input rate in order to determine if the applicable NO_x emission limitation specified for this emissions unit has been exceeded.

Operation of this source at a heat input rate greater than 129.6 mmBtu/hr (based on a 3-hour rolling heat input rate average excluding startup, shutdown, and malfunction values) does not constitute a violation, however, any operation of this source at a heat input rate greater than 129.6 mmBtu/hr (based on a 3-hour rolling heat input rate average excluding startup, shutdown, and malfunction values), will require additional NO_x emissions testing at, or above, this calculated heat input rate in order to determine if the applicable NO_x emission limitation has been exceeded, which may result in a mass emissions violation (see additional testing requirements for this emissions unit).

Note: The site-specific 20% buffer allocated for this source in determining the total heat input rating accounts for an acceptable variation in operating loads and parameters due to product specifications. Of particular concern is the variation in the furnace temperature due to the prescribed heat input amounts required during production of specific product grades and the potential impacts on furnace operational throughput from upstream and downstream units. These temperature variations can create non-steady state conditions inside the furnace causing the burners to fire only required amounts of natural gas necessary to maintain temperature stability and operational efficiency during production. Operation of this unit within the 20% range is not expected to contribute to a NO_x emission increase.

b. The NO_x emission rate for this emissions unit (0.055 lb/mmBtu) was established using the results of NO_x emissions testing conducted in March 2012 (The average of 3, 1-hour run NO_x emission average for each test), plus a 20% buffer. The average NO_x emissions from these emission tests were determined to be 0.046 lb/mmBtu**. [0.046 + 20% = 0.055 lb/mmBtu].** The average calculated heat input rate during these tests runs was determined to be 108.0 mmBtu/hr.

c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

e. The potential SO_2 emissions from this emissions unit are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO_2 emissions).

c) Operational Restrictions

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

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

d) Monitoring and/or Record Keeping Requirements

(1) The permittee shall maintain records of the 3-hour rolling heat input rate average for this emissions unit. The heat input rate shall be calculated as follows:

Natural gas fuel used (ft^3/hr)] x [1,020 Btu/ft^3 of natural gas/10^6] = Heat Input, mmBtu/hr

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-03(J)]

(2) For each occurrence where the 3-hour rolling heat input rate average is higher than 129.6 MMBtu/hr (or any subsequent higher heat input value for which compliance has been demonstrated) the permittee shall maintain records of the following:

a. the calculated 3-hour heat input rate average that exceeded the applicable limit;

b. the hourly throughput rate of the steel billets (tons/hour); and

c. the product specification of the steel billets processed during this 3-hour period.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-03(J)]

(3) 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) No later than 60 days after any 3-hour rolling heat input rate average is above the heat input testing threshold (108.0 MMBtu/hr), or any subsequent higher heat input value for which compliance has been demonstrated, the permittee shall submit a report to Ohio EPA, NEDO that specifies the calculated 3-hour rolling heat input rate average for this emissions unit (excluding startup, shutdown, and malfunction values). This report shall specify what the 3-hour rolling heat input rate average was calculated to be, the hourly throughput rate of the steel billets (tons/hour) and product specification of the steel billets processed during this 3-hour period.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-03(J)]

(2) The permittee shall summarize in an <u>annual</u> report each occurrence that the 3-hour rolling heat input rate average exceeded the 108.0 MMBtu/hr (or any subsequent higher heat input value for which compliance has been demonstrated) heat input threshold and what the 3-hour rolling heat input average was determined to be for each occurrence. In

addition, the permittee shall identify in the annual report the status of conducting further emissions testing, if so required, by the terms and conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-03(J)]

(3) 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.

[Authority for term: 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. Emission Limitation:

NO_x emissions shall not exceed 0.055 lb/mmBtu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the NOx emission limitation in accordance with the test methods and procedures specified in Method 7, 7a, 7c, 7d, or 7e of 40 CFR Part 60, Appendix A, and any additional approved USEPA methods, as applicable.

Compliance with the heat input threshold shall be demonstrated by following the requirements specified in the monitoring, record keeping and reporting requirements contained in this permit.

Operation of this source at a heat input rate greater than 108.0 mmBtu/hr (based on a 3-hour rolling heat input rate average excluding startup, shutdown, and malfunction values) does not constitute a violation, however, any operation of this source at a heat input rate greater than 108.0 mmBtu/hr (based on a 3-hour rolling heat input rate average excluding startup, shutdown, and malfunction values) will require additional NO_x emissions testing at, or above, this calculated heat input rate in order to determine if the applicable NO_x emission limitation has been exceeded.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-03(J)]

b. Emission Limitation:

SO_2 emissions shall not exceed 1.98 lbs/mmBtu of actual heat input.

SO_2 emissions shall not exceed 178 lbs/hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the SO2 emission limitations through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60 Appendix A, Methods 1 through 4 and Method 6 and OAC rule 3745-18-04, or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(E)]

(2) The permittee shall schedule the NO_x emissions test within 60 days of any heat input rate greater than 129.6 mmBtu/hr (based on a 3-hour rolling heat input rate average excluding startup, shutdown, and malfunction values) or any subsequent higher heat input value for which compliance has been demonstrated in order to show compliance with the applicable NO_x emission limitation.

Additional NO_x emissions testing shall be performed at any time the furnace is operated at a rate (based on a 3-hour rolling heat input rate average, excluding startup, shutdown, and malfunction values) which is 20% above the highest heat input rate at which compliance has been demonstrated with the applicable NO_x emission limitation and to establish a higher rate range for which the unit is allowed to operate that shows compliance with the applicable NO_x emission limitation.

NO_x emissions testing shall be conducted in accordance with the test methods and procedures specified in Method 7, 7a, 7c, 7d, or 7e of 40 CFR Part 60, Appendix A, and any additional approved USEPA methods, as applicable.

The results of subsequent NO_x emissions testing shall be submitted to the Ohio EPA, NEDO within 60 days of completion.

The permittee may seek an extension to conduct the NO_x emissions test. The extension request shall provide sufficient demonstration by the permittee that production orders for this emissions unit within the allotted emission testing timeframe would not allow the furnace to operate at the required higher heat input rate to demonstrate compliance with the applicable NO_x emission limitation.

The request for an extension shall be submitted to Ohio EPA, NEDO, in writing, within 45 days of the report's submission.

Note: Product specification largely dictates heat input values. Products runs are order dependent and, therefore, the time lapse between identical products runs may exceed the retesting timelines prescribed in this section. A particular product run may increase heat input to an extent that the retesting threshold is surpassed. However, it may not be known to the permittee at the time if a similar product run will occur within the allotted timeframe. Accordingly, the permittee may seek an extension to retest until a product requiring similar heat inputs is scheduled to be run.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-110-03(J)]

g) Miscellaneous Requirements

(1) None.

8. P040, No. 4 Seamless Mill Reheat Furnace

Operations, Property and/or Equipment Description:

50.9 MMBtu/hr Natural Gas Fired Reheat 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)(3) (PTI P0117763, issued 10/7/2014)	Nitrogen oxides (NO_x) emissions shall not exceed 7.64 lbs/hr. Carbon monoxide (CO) emissions shall not exceed 4.36 lbs/hr. Particulate emissions (PE) shall not exceed 0.10 lb/hr (filterable). Sulfur dioxide (SO_2) emissions shall not exceed 0.031 lb/hr. Organic compound (OC) emissions shall not exceed 0.29 lb/hr. NO_x emissions shall not exceed 0.15 lb/MMBtu of actual heat input (as measured at the maximum firing condition).
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 the rule.
d.	OAC rule 3745-18-53(D)(4)	See b)(2)a.
e.	OAC rule 3745-110-03(P)	NO_x emissions shall not exceed 0.15 lb/MMBtu of actual heat input (as measured at the maximum firing condition).

(2) Additional Terms and Conditions

a. The emission limitation required by this applicable 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.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0117763]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117763]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0117763]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing on this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted approximately 6 months prior to the expiration of this permit.

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

i. NO_x emissions shall not exceed 0.15 lb/MMBtu of actual heat input (as measured at the maximum firing condition).

ii. NO_x emissions shall not exceed 7.64 lbs/hr.

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

i. forNO_x, Methods 1 through 4 and Method 7 or 7E (as applicable) of 40 CFR Part 60, Appendix A.

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

e. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Ohio EPA, NEDO. 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.

f. 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, NEDO. 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, NEDO's refusal to accept the results of the emission test(s).

g. Personnel from the Ohio EPA, NEDO 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.

h. 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, NEDO 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, NEDO.

[Authority for term: 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. <u>Emission Limitations</u>:

NO_x emissions shall not exceed 0.15 lb/MMBtu of actual heat input (as measured at the maximum firing condition).

NO_x emissions shall not exceed 7.64 lbs/hr.

<u>Applicable Compliance Method</u>:

The permittee may demonstrate compliance with the short-term NO_x emission limitations in accordance with the test methods and procedures specified in term f)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and P0117763]

b. Emission Limitation:

CO emissions shall not exceed 4.36 lbs/hr.

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly CO emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 84 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10 or other USEPA-approved test methods with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0117763]

c. Emission Limitation:

PE shall not exceed 0.10 lb/hr (filterable).

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly PE emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 1.9 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly PE emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0117763]

d. Emission Limitation:

SO_2 emissions shall not exceed 0.031 lb/hr.

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly SO2 emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 0.6 lb/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly SO_2 emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6 and OAC rule 3745-18-04 or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0117763]

e. Emission Limitation:

OC emissions shall not exceed 0.29 lb/hr.

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly OC emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 5.5 lb/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 25 or 25A, as appropriate. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and USEPA guidance documents. Alternative USEPA-approved test methods may be used with prior approval from Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0117763]

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, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1) or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and P0117763]

g) Miscellaneous Requirements

(1) None.

9. P048, No. 3 Seamless Mill Rotary Mill

Operations, Property and/or Equipment Description:

Seamless Mill Rotary 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 3745-17-11(B)	Particulate emissions (PE) shall not exceed 13.4 lbs/hr. See b)(2)c.
b.	OAC rule 3745-17-08(B)(3)	See b)(2)a and b)(2)c.
c.	OAC rule 3745-17-11(A)(5)	See b)(2)c and b)(2)d.
d.	OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
e.	OAC rule 3745-17-07(B)(1)	Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.
f.	40 CFR Part 64 CAM Plan	See d)(1), d)(2), d)(3), d)(4) and e)(1).

(2) Additional Terms and Conditions

a. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:

i. the installation and use of hood(s), fan(s) and other equipment to adequately enclose, contain, capture, and vent the fugitive dust from this emissions unit to the cyclone separator and the venturi scrubber;

ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design; and

iii. the control equipment employed shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s), whichever is less stringent.

b. All captured emissions from the No. 3 Seamless Mill Rotary Mill shall be routed to the cyclone separator and the venturi scrubber.

c. This emissions unit emits particulate emissions that are subject to the requirements of OAC rule 3745-17-11 (the restrictions on particulate emissions from industrial processes) and emits fugitive particulate emissions that are subject to the requirements of OAC rule 3745-17-08 (the restrictions of emissions of fugitive dust).

The total particulate emissions from the outlet of the stack of the scrubber on the No. 3 Seamless Rotary Mill shall not exceed the combined allowable particulate emissions rate of 30 lbs/hr. This combined allowable emissions rate includes the allowable emissions rate from OAC rule 3745-17-11 [Curve P-1 of Figure II: allowable emissions rate (A) = $0.5782(U)^{0.6456}$, where the Uncontrolled Mass Rate of Emissions (UMRE or U) is 130.2 lbs/hr] and the allowable emissions rate from OAC rule 3745-17-08 [0.030 gr/dscf x (64,741 - 0) dscfm x 60 min/hr x 1 lb/7000 gr].

The No. 3 Seamless Rotary Mill was installed in 1930, and control equipment (partial hooding and settling chamber) was installed on the emissions unit in 1968. The control equipment had captured fifty percent (50%) of the particulate emissions emitted by the emissions unit. The settling chamber controlled five percent (5%) of the particulate emissions. The particulate emissions exiting the settling chamber were then exhausted to the ambient air through two (2) stacks. These captured particulate emissions had become and are currently subject to the requirements of OAC rule 3745-17-11.

The remaining fifty percent (50%) of the uncaptured particulate emissions were emitted through non-stack egress points (roof monitors) and were defined as fugitive particulate emissions. These fugitive particulate emissions had become and are currently subject to the requirements of OAC rule 3745-17-08.

The existing control equipment installed in 1968 (partial hooding and a settling chamber) was replaced in 1996 with localized hooding capturing seventy percent (70%) of particulate emissions and a baghouse. In 1999, the control equipment was replaced again with a tight fitting movable hood capturing one hundred percent (100%) of particulate emissions, a cyclone separator and a venturi wet scrubber.

The value of UMRE of 130.2 lbs/hr is based on control device inlet tests conducted in 1997. The 1996 control equipment (localized hooding and a

baghouse) was installed and operating during the time of these tests. Seventy percent (70%) of particulate emissions were captured and vented to the baghouse. The total hourly particulate emissions rate (process and fugitive particulate emissions) of 260.4 lbs/hr was calculated by dividing the average test results of 182.3 lbs/hr by fractional value of 70%. The UMRE of 130.2 lbs/hr was then calculated by multiplying the total particulate emissions rate of 260.4 lbs/hr by the fractional value of fifty percent (50%).

The value of 64,741 dscfm is the most conservative recorded airflow from the outlet of the scrubber stack on the No. 3 Seamless Rotary Mill during any of the past four stack tests conducted on March 24, 1999 (57,535 dscfm), December 7, 2005 (57,785 dscfm), June 28, 2006 (54,955 dscfm) and February 22, 2013 (64,741 dscfm).

Not enough data is available to determine the airflow rate at the time when the No. 3 Seamless Rotary Mill was operating with its 1968 control equipment (partial hooding and settling chamber). Therefore, the airflow rate is assigned the most conservative value of 0 dscfm.

d. The No. 3 Seamless Rotary Mill shall be deemed in compliance if the stack test results document a particulate emission rate that does not exceed the combined allowable emission rate of 30 lbs/hr.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the scrubber and to continuously monitor the scrubber water flow rate, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the scrubber, in inches of water, on a once per shift basis, and record the scrubber water flow rate, in gallons per minute, on a once per shift basis.

The acceptable range for the pressure drop across the scrubber is 34 inches of water or more.

The acceptable range for the scrubber water flow rate is 590 gallons per minute or more.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;
b. the magnitude of the deviation at that time;
c. the date the investigation was conducted;
d. the name(s) of the personnel who conducted the investigation; and
e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;
g. the date the corrective action was completed;
h. the date and time the deviation ended;
i. the total period of time (in minutes) during which there was a deviation;
j. the flow rate readings immediately after the corrective action was implemented; and
k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)]

(2) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the scrubber controlling this emissions unit are liquid flow rate and pressure drop across the scrubber, which were established in accordance with the manufacturer's recommendations. When the liquid flow rate or pressure drop across the scrubber show operation outside the indicator range(s), 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 Section e) 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 venturi scrubber shall not be configured to have bypass capability.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)]

(3) At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)]

(4) 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, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)]

(5) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any building openings housing this emissions unit. These building openings shall include, but not limited to, doorways, windows, and roof monitors. The presence of any abnormal 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 minimize or eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;

c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

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

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing on this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted approximately 6 months prior to the expiration of this permit.

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

i. 30 lbs/hr particulate emissions

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

i. for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A.

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

e. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Ohio EPA, NEDO. 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.

f. 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, NEDO. 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, NEDO's refusal to accept the results of the emission test(s).

g. Personnel from the Ohio EPA, NEDO 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.

h. 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, NEDO 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, NEDO.

[Authority for term: 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. <u>Emission Limitation</u>:

PE shall not exceed 0.030 grain per dry standard cubic foot of exhaust gases. [OAC rule 3745-17-08 limit]

PE shall not exceed 13.4 lbs/hr. [OAC rule 3745-17-11 limit]

The total particulate emissions from the outlet of the stack of the scrubber on the No. 3 Seamless Rotary Mill shall not exceed the combined (stack plus fugitive) allowable particulate emissions rate of 30 lbs/hr.

<u>Applicable Compliance Method</u>:

Compliance with the 30 lbs/hr particulate emission limitation [see b)(2)c and b)(2)d] shall be demonstrated based upon an emission test performed in accordance with the requirements specified in f)(1).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible fugitive particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1) or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1) or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

10. P049, Small OD Product Austenitizing Furnace

Operations, Property and/or Equipment Description:

34.0 MMBtu/hr heat input natural gas-fired heat treat 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)(3) (PTI P0106201 issued 8/4/2010)	Nitrogen oxides (NO_x) emissions shall not exceed 0.08 lb/mmBtu of actual heat input (as measured at the maximum firing condition). NO_x emissions shall not exceed 21.68 tpy. Carbon monoxide (CO) emissions shall not exceed 5.14 lbs/hr and 22.51 tpy.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0106201 issued 8/4/2010)	Particulate emissions (PE) shall not exceed 0.46 lb/hr and 2.04 tpy. Sulfur dioxide (SO_2) emissions shall not exceed 0.037 lb/hr and 0.16 tpy. Organic compound (OC) emissions shall not exceed 0.67 lb/hr and 2.95 tpy. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (PTI P0106201 issued 8/4/2010)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	See b)(2)c.
e.	OAC rule 3745-17-07(A)	See b)(2)d.
f.	OAC rule 3745-18-06(E)(2)	See b)(2)e.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 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 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph 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 Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO2 and OC from this air contaminant source since the uncontrolled potential to emit for PE, SO_2 and OC is less than 10 tons/yr.

c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(17), is equal to zero.

d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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).

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0106201]

d) Monitoring and/or Recordkeeping 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

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:

NO_x emissions shall not exceed 0.08 lb/mmBtu of actual heat input (as measured at the maximum firing condition).

NO_x emissions shall not exceed 21.68 tpy.

Applicable Compliance Methods:

Compliance with the short-term NO_x emission limitation has been demonstrated based upon previous emission testing conducted on this emissions unit. If required, compliance shall be demonstrated based upon additional emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7 or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the short-term NO_x emission limitation by the maximum heat input of the furnace, multiplying this product by the maximum annual operating schedule of 8760 hours per year and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

b. Emission Limitations:

CO emissions shall not exceed 5.14 lbs/hr and 22.51 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly CO emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 84 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission testing performed in accordance with the

methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10 or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly CO emission limitation by the maximum annual operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

c. Emission Limitations:

PE shall not exceed 0.46 lb/hr and 2.04 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly PE emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 1.9 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly PE emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly PE emission limitation by the maximum annual operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

d. Emission Limitations:

SO_2 emissions shall not exceed 0.037 lb/hr and 0.16 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly SO2 emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 0.6 lb/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly SO_2 emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6 and OAC rule 3745-18-04, or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly SO_2 emission limitation by the maximum annual operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

e. Emission Limitations:

OC emissions shall not exceed 0.67 lb/hr and 2.95 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly OC emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 11 lb/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 25 or 25A, as appropriate. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and USEPA guidance documents. Alternative USEPA-approved test methods may be used with prior approval from Ohio EPA.

The annual emission limitation was developed by multiplying the hourly OC emission limitation by the maximum annual operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

g) Miscellaneous Requirements

(1) None.

11. P050, Small OD Product Tempering Furnace

Operations, Property and/or Equipment Description:

34.0 MMBtu/hr heat input natural gas-fired heat treat 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)(3) (PTI P0106201 issued 8/4/2010)	Nitrogen oxides (NO_x) emissions shall not exceed 0.08 lb/mmBtu of actual heat input (as measured at the maximum firing condition). NO_x emissions shall not exceed 11.91 tpy. Carbon monoxide (CO) emissions shall not exceed 2.80 lbs/hr and 12.26 tpy.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0106201 issued 8/4/2010)	Particulate emissions (PE) shall not exceed 0.25 lb/hr and 1.11 tpy. Sulfur dioxide (SO_2) emissions shall not exceed 0.02 lb/hr and 0.09 tpy. Organic compound (OC) emissions shall not exceed 0.37 lb/hr and 1.61 tpy. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (PTI P0106201 issued 8/4/2010)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	See b)(2)c.
e.	OAC rule 3745-17-07(A)	See b)(2)d.
f.	OAC rule 3745-18-06(E)(2)	See b)(2)e.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 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 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph 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 Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, SO2 and OC from this air contaminant source since the uncontrolled potential to emit for PE, SO_2 and OC is less than 10 tons/yr.

c. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(17), is equal to zero.

d. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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).

c) Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0106201]

d) Monitoring and/or Recordkeeping 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

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:

NO_x emissions shall not exceed 0.08 lb/mmBtu of actual heat input (as measured at the maximum firing condition).

NO_x emissions shall not exceed 11.91 tpy.

Applicable Compliance Methods:

Compliance with the $lbNO_x$/mmBtu emission limitation has been demonstrated based upon previous emission testing conducted on this emissions unit. If required, compliance shall be demonstrated based upon additional emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7 or 7A or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the short-term NO_x emission limitation (0.08 lb/mmBtu) by the maximum heat input of the furnace (34 mmBtu/hr), multiplying this product by the maximum annual operating schedule of 8760 hours per year and then dividing by 2000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

b. Emission Limitations:

CO emissions shall not exceed 2.80 lbs/hr and 12.26 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly CO emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 84 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission testing performed in accordance with the

methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10 or other USEPA-approved test methods with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly CO emission limitation by the maximum annual operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

c. Emission Limitations:

PE shall not exceed 0.25 lb/hr and 1.11 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly PE emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 1.9 lbs/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly PE emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly PE emission limitation by the maximum annual operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

d. Emission Limitations:

SO_2 emissions shall not exceed 0.02 lb/hr and 0.09 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly SO2 emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 0.6 lb/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly SO_2 emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6 and OAC rule 3745-18-04 or other USEPA-approved test methods, with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly SO_2 emission limitation by the maximum annual operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

e. Emission Limitations:

OC emissions shall not exceed 0.37 lb/hr and 1.61 tpy.

Applicable Compliance Methods:

The permittee may demonstrate compliance with the hourly OC emission limitation by multiplying the maximum hourly natural gas consumption rate (mmcuft/hr) by 11 lb/mmcuft (from AP-42, Table 1.4-1, 7/98 version).

If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission testing performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 25 or 25A, as appropriate. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and USEPA guidance documents. Alternative USEPA-approved test methods may be used with prior approval from Ohio EPA.

The annual emission limitation was developed by multiplying the hourly OC emission limitation by the maximum annual operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

g) Miscellaneous Requirements

(1) None.

12. P051, Small OD Product Quench Water Cooling Tower

Operations, Property and/or Equipment Description:

#6 Q & T, Quench Water 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(A)(3), as effective 11/30/01 (PTI P0106201 issued 8/4/2010)	Particulate emissions (PE) shall not exceed 1.40 lbs/hr and 6.14 tpy. [PE is assumed to be all PM_{10}.] The permittee shall install a drift eliminator with a maximum drift rate of 0.005%, by weight, onto this emissions unit. Visible particulate emissions from this emissions unit shall not exceed 10% opacity as a 6-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (PTI P0106201 issued 8/4/2010)	See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)c.
e.	40 CFR Part 63, Subpart Q	See b)(2)d and c)(2).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 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 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph 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) do not apply to the PE from this air contaminant source since the uncontrolled potential to emit for PE is less than 10 tons/yr.

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

d. The provisions of 40 CFR Part 63, Subpart Q, apply to all new and existing industrial process cooling towers that are operated with chromium-based water treatment chemicals and are either major sources or are integral parts of facilities that are major sources as defined in 40 CFR 63.401. Since chromium-based water treatment chemicals will not be used in this emissions unit, the provisions of this subpart do not apply to this emissions unit.

c) Operational Restrictions

(1) The permittee shall maintain an average total dissolved solids (TDS) concentration of the cooling water less than or equal to 3,500 lbs TDS per 1,000,000 lbs water (3,500 ppm).

[Authority for term: OAC rule 3745-77-07(A)(1), and PTI P0106201]

(2) The permittee shall not use chromium-based water treatment chemicals in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1), and PTI P0106201]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall monitor and maintain records of the weekly TDS content of the circulating cooling water, in ppm, on a weekly basis.

[Authority for term: OAC rule 3745-77-07(C)(1), and PTI P0106201]

(2) For each day during which the permittee uses a chromium-based water treatment chemicals in this emissions unit, the permittee shall maintain a record of the type and quantity of the chemicals used.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the average TDS limitation. The reports shall identify any corrective action taken to reduce the TDS concentration.

[Authority for term: OAC rule 3745-77-07(C)(1), and PTI P0106201]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify the use of any chromium-based water treatment chemicals.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

[Authority for term: 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. Emission Limitations:

PE shall not exceed 1.40 lbs/hr and 6.14 tpy.

Applicable Compliance Methods:

Compliance with this emission limitation shall be demonstrated by the following one-time calculation.

PE (lbs/hr) = Q x (TDS) x (Drift/100) x (Density) x (60 min/hr)

where:

Q = maximum cooling tower circulating water flow rate (16,000 gallons/min);

TDS = the maximum TDS concentration in the circulating water 3,500 lbs TDS per 1,000,000 lbs water (3,500 PPM);

Drift = the maximum drift loss, 0.005%; and

Density = Density of water, 8.345 lb/gal.

The annual emission limitation was developed by multiplying the hourly PE emission limitation by the maximum annual operating schedule of 8760 hours per year and dividing by 2000 lbs/ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

[Authority for term: OAC rule 3745-77-07(C)(1), and PTI P0106201]

b. Emission Limitation:

Visible particulate emissions from this emissions unit shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1) or other USEPA-approved test methods, with prior approval from the Ohio EPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0106201]

g) Miscellaneous Requirements

(1) None.

13. Emissions Unit Group -Coating Operations: K003,K005,K006,

EU ID	Operations, Property and/or Equipment Description
K003	No. 3 Seamless Mill No. 3 Pipe Coater
K005	No. 4 Seamless Mill No. 5 Pipe Coater
K006	No. 4 Seamless Mill No. 6 Pipe Coater

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) (For K003, PTI 02-1974issued 6/5/1985) (For K005, PTI 02-1975issued 6/5/1985) (For K006, PTI 02-1976issued 6/5/1985)	Volatile organic compounds (VOC) emissions shall not exceed 3.75 pounds per gallon of coating, as applied, excluding water and exempt solvents. (for each emissions unit separately)
b.	OAC rule 3745-21-09(U)(1)(a)	See b)(2)a.

(2) Additional Terms and Conditions

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

c) Operational Restrictions

(1) The maximum annual coating usage for emissions unit K003 shall not exceed 74,000 gallons, based upon a rolling, 12-month summation of the coating usage.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-1974]

(2) The maximum annual coating usage for emissions unit K005 shall not exceed 43,500 gallons, based upon a rolling, 12-month summation of the coating usage.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-1975]

(3) The maximum annual coating usage for emissions unit K006 shall not exceed 43,500 gallons, based upon a rolling, 12-month summation of the coating usage.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-1976]

d) Monitoring and/or Recordkeeping Requirements

(1) For each emissions unit separately, the permittee shall maintain monthly records of the following information:

a. the total coating usage for each month, in gallons; and

b. the rolling, 12-month summation of the coating usage, in gallons.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-1974, PTI 02-1975 and PTI 02-1976]

(2) For each emissions unit separately, the permittee shall collect and record the following information for each day of operation:

a. the name and identification number of each coating, as purchased and received;

b. the VOC content of each coating material (excluding water and exempt solvents), as purchased and received;

c. the VOC content of each solvent material;

d. the amount of each solvent material added to coating material per day;

e. the amount of each coating material used per day, excluding water and exempt solvents; and

f. the daily, volume-weighted average VOC content of the coatings, as applied, in pounds per gallon of coating, excluding water and exempt solvents, calculated in accordance with the following equation:

E = [Summation of (Ai*Bi + Ci*Di) for all coating materials and solvent materials employed] / [Summation of (Ai + Ci) for all coating materials and solvent materials employed]

where:

E = VOC content of the applied coatings, in lbs per gallon, excluding water and exempt solvents;

Ai = gallons of coating material i consumed per day (prior to any solvent additions), excluding water and exempt solvents;

Bi = VOC content of coating material i as received, in lbs VOC per gallon, excluding water and exempt solvents;

Ci = gallons of solvent material i added per day;

Di = VOC content of solvent material i, in lbs VOC per gallon;

i = subscript denoting a coating material or solvent material employed (i = 1 to n); and

n = total number of coating materials and solvent materials employed per day.

USEPA Method 24 shall be used to determine the VOC content for each coating. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24. The VOC content of each the solvent added to the coating material may be determined based upon the formulation data.

[Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-1974, PTI 02-1975 and PTI 02-1976]

e) Reporting Requirements

(1) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install No. 02-1974, 02-1975 and 02-1976, issued on June 5, 1985: e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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

a. any exceedances of the rolling, 12-month coating usage limitations specified in c)(1), c)(2) and/or c)(3) of this permit;

b. any exceedances of the VOC content limitations of 3.75 pounds per gallon;

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

[Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-1974, PTI 02-1975 and PTI 02-1976]

(3) All reports shall be submitted electronically through Ohio EPA Air Services, unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[Authority for term: OAC rule 3745-15-03(A)]

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 Limitation:

VOC emissions shall not exceed 3.75 pounds per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the record keeping requirements specified in d)(2).

[Authority for term: OAC rule 3745-77-07(C)(1), PTI 02-1974, PTI 02-1975 and PTI 02-1976]

g) Miscellaneous Requirements

(1) None.