



NOV 18 1997

State of Ohio Environmental Protection Agency

Street Address:

1800 WaterMark Drive  
Columbus, OH 43215-1099

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

Mailing Address:

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

11/13/97

**CERTIFIED MAIL**

15-76-13-0696

**RE: Final Chapter 3745-35 Permit To Operate**

Republic Engineered Steels, Inc. - Massillon HRB  
Les Moor  
410 Oberlin Road, SW  
Massillon, OH 44647-0000

Dear Les Moor:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

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

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

Environmental Review Appeals Commission  
236 East Town Street  
Room 300  
Columbus, Ohio 43215

If you have any questions, please contact the Canton Division of Air Pollution Control at (216) 489-3385.

Very truly yours,

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

cc: Canton Division of Air Pollution Control  
Jim Orlemann, DAPC Engineering  
Becky Castle, DAPC PMU



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 11/13/97

Facility ID: 15-76-13-0696

Expiration Date: 11/13/00

FINAL ISSUE

This document constitutes issuance for:

Republic Engineered Steels, Inc. - Massillon HRB  
410 Oberlin Road, SW  
Massillon, OH 44647-0000

of a permit to operate for:

B008 (Mill Office Boiler)  
Natural Gas Fired Boiler

### PART I General Terms & Conditions

#### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

#### 2. 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.

#### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

#### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

#### **5. 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 and federal 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.

#### **6. Scheduled Maintenance/Malfunction Reporting**

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

#### **7. Permit Transfers**

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

#### **8. 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.

#### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

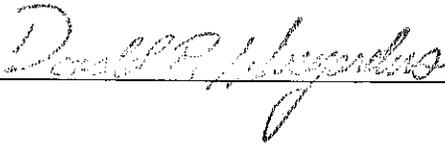
Canton Division of Air Pollution Control  
420 Market Avenue N.  
Canton, OH 44702-1544  
(216) 489-3385

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

**10. The permittee is also subject to the attached special terms and conditions.**

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director

A handwritten signature in cursive script, appearing to read "Donald R. Reynolds", is written over a horizontal line. The signature is written in dark ink and is positioned to the right of the printed word "Director".

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Facility Name: Republic Engineered Steels, Inc. - Massillon H  
Facility ID: 15-76-13-0696  
Emissions Unit: Mill Office Boiler (B008)

## Part II: Special Terms and Conditions

### A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
0.777 MMBtu/hr, natural gas fired boiler, mill office boiler (with stack)	OAC Rule 3745-17-10, including but not limited to OAC Rule 3745-17-10 (B) (1)	Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.
(Same)	OAC Rule 3745-18-06, including but not limited to OAC Rule 3745-18-06 (A)	Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input if fuel heat content is < 950 Btu per standard cubic foot and sulfur content is > 0.6 pound per MMSCF.
(Same)	OAC Rule 3745-17-07, including but not limited to OAC Rule 3745-17-07 (A)	Visible Emission Limits (See Additional Terms & Conditions 2.b.)

### 2. Additional Terms and Conditions

- The total NOx emissions from this facility shall not exceed 95 tons/yr. This annual emission limit shall be obtained by limiting the amount of natural gas burned at this facility. The burning of natural gas is the only source of NOx emissions.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B008, B009, P081, P082 and the following exempt equipment: 18" Mill Torch Cutting Operation, Product Scrap Preparation/Torch Cutting Operations, Maintenance Scrap Preparation/Torch Cutting Operations, Machine Shop Parts Heater, Chain Repair Furnace & Space and Water Heaters.

- Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

### B. Operational Restrictions

- Natural gas shall be the only fuel burned in this emissions unit.
- The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling, twelve-month summation. (Each month will establish a separate twelve-month period.)

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Facility Name: Republic Engineered Steels, Inc. - Massillon H  
Facility ID: 15-76-13-0696  
Emissions Unit: Mill Office Boiler (B008)

**B. Operational Restrictions (continued)**

3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) (After Permit Issuance)	Allowable Total Cumulative Natural Gas Consumption (MMCF)
1	146
1-2	286
1-3	424
1-4	532
1-5	630
1-6	724
1-7	815
1-8	900
1-9	988
1-10	1080
1-11	1198
1-12	1318

After the first 12 calendar months of operation under this permit, compliance with the annual cubic feet limitation shall be based upon a rolling, twelve-month summation of the natural gas usage.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records which list the following information:
- 1.a The total natural gas usage for all emissions units at the facility.
  - 1.b Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
  - 1.c During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

**D. Reporting Requirements**

1. The permittee shall submit exceedance reports within 30 days following the end of each month during which an exceedance occurred that identify the following:
- 1.a All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
  - 1.b After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling, 12-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NO<sub>x</sub> emissions and the total amount of natural gas used at this facility for the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3.)

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Facility Name: Republic Engineered Steels, Inc. - Massillon H  
Facility ID: 15-76-13-0696  
Emissions Unit: Mill Office Boiler (B008)

### E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:

The AP-42 emission factor for filterable particulate emissions, 6.2 lbs/MMCF, shall be used to show compliance with the allowable particulate emission rate.

Emission Limitation:

The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF})(X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:

Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:

OAC Rule 3745-17-03 (B) (1), EPA Method nine (9).

Emission Limitation:

Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input.

Applicable Compliance Method:

The AP-42 emission factor, 0.6 lb/MMCF, for natural gas combustion shall be used to show compliance with the allowable sulfur dioxide emission rate.

### F. Miscellaneous Requirements (continued)

1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (B008) in combination with B009, P081, P082 and other equipment exempt from permitting: A through F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 11/13/97

Facility ID: 15-76-13-0696

Expiration Date: 11/13/00

FINAL ISSUE

This document constitutes issuance for:

Republic Engineered Steels, Inc. - Massillon HRB  
410 Oberlin Road, SW  
Massillon, OH 44647-0000

of a permit to operate for:

B009 (Main Office Boiler)  
Natural Gas Fired Boiler

### PART I General Terms & Conditions

#### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

#### 2. 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.

#### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

#### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

#### **5. 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 and federal 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.

#### **6. Scheduled Maintenance/Malfunction Reporting**

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

#### **7. Permit Transfers**

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

#### **8. 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.

#### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

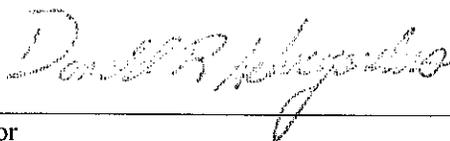
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control  
420 Market Avenue N.  
Canton, OH 44702-1544  
(216) 489-3385

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

**10. The permittee is also subject to the attached special terms and conditions.**

OHIO ENVIRONMENTAL PROTECTION AGENCY



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Director

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Facility Name: Republic Engineered Steels, Inc. - Massillon H  
Facility ID: 15-76-13-0696  
Emissions Unit: Main Office Boiler (B009)

## Part II: Special Terms and Conditions

### A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4.2 MMBtu/hr, natural gas fired boiler, main office boiler (with stack)	OAC Rule 3745-17-10, including but not limited to OAC Rule 3745-17-10 (B) (1)	Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.
(Same)	OAC Rule 3745-18-06, including but not limited to OAC Rule 3745-18-06 (A)	Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input if fuel heat content is < 950 Btu per standard cubic foot and sulfur content is > 0.6 pound per MMSCF.
(Same)	OAC Rule 3745-17-07, including but not limited to OAC Rule 3745-17-07 (A)	Visible Emission Limits (See Additional Terms & Conditions 2.b.)

### 2. Additional Terms and Conditions

- 2.a The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be obtained by limiting the amount of natural gas burned at this facility. The burning of natural gas is the only source of NOx emissions.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B008, B009, P081, P082 and the following exempt equipment: 18" Mill Torch Cutting Operation, Product Scrap Preparation/Torch Cutting Operations, Maintenance Scrap Preparation/Torch Cutting Operations, Machine Shop Parts Heater, Chain Repair Furnace & Space and Water Heaters.

- 2.b Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

### B. Operational Restrictions

- Natural gas shall be the only fuel burned in this emissions unit.
- The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.

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Facility Name: Republic Engineered Steels, Inc. - Massillon H  
Facility ID: 15-76-13-0696  
Emissions Unit: Main Office Boiler (B009)

**B. Operational Restrictions (continued)**

3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) (After Permit Issuance)	Allowable Total Cumulative Natural Gas Consumption (MMCF)
1	146
1-2	286
1-3	424
1-4	532
1-5	630
1-6	724
1-7	815
1-8	900
1-9	988
1-10	1080
1-11	1198
1-12	1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records of the following information:
  - 1.a The total natural gas usage for all emissions units at the facility.
  - 1.b Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
  - 1.c During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

**D. Reporting Requirements**

1. The permittee shall submit exceedance reports within 30 days following the end of each month during which an exceedance occurred that identify the following:
  - 1.a All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
  - 1.b After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3.)

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Facility Name: Republic Engineered Steels, Inc. - Massillon H  
Facility ID: 15-76-13-0696  
Emissions Unit: Main Office Boiler (B009)

## E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:

The AP-42 emission factor for filterable particulate emissions, 6.2 lbs/MMCF, shall be used to show compliance with the allowable particulate emission rate.

Emission Limitation:

The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [ (144.2 \text{ lbs/MMCF}) (X) ] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:

Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:

OAC rule 3745-17-03 (B)(1), EPA Method nine (9).

Emission Limitation:

Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input.

Applicable Compliance Method:

The AP-42 emission factor, 0.6 lb/MMCF, for natural gas combustion shall be used to show compliance with the allowable sulfur dioxide emission rate.

## F. Miscellaneous Requirements

1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (B009) in combination with B008, P081, P082 and other equipment exempt from permitting: A through F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 11/13/97

Facility ID: 15-76-13-0696

Expiration Date: 11/13/00

FINAL ISSUE

This document constitutes issuance for:

Republic Engineered Steels, Inc. - Massillon HRB  
410 Oberlin Road, SW  
Massillon, OH 44647-0000

of a permit to operate for:

P081 (12 Mill Anneal)  
12 Mill Anneal

### PART I General Terms & Conditions

#### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

#### 2. 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.

#### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

#### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

#### **5. 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 and federal 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.

#### **6. Scheduled Maintenance/Malfunction Reporting**

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

#### **7. Permit Transfers**

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

#### **8. 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.

#### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

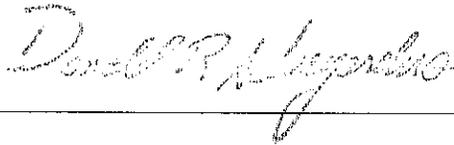
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control  
420 Market Avenue N.  
Canton, OH 44702-1544  
(216) 489-3385

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

**10. The permittee is also subject to the attached special terms and conditions.**

OHIO ENVIRONMENTAL PROTECTION AGENCY



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Director

**Part II: Special Terms and Conditions**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
12.3 MMBtu/hr, natural gas fired heat treat furnace, 12" mill heat treat furnace (without stack)	OAC Rule 3745-35-07	No particulate limit since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

**2. Additional Terms and Conditions**

- 2.a The total NOx emissions from this facility shall not exceed 95 tons/yr. This annual emission limit shall be met by limiting the amount of natural gas burned at this facility. The burning of natural gas is the only source of NOx emissions.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B008, B009, P081, P082 and the following exempt equipment: 18" Mill Torch Cutting Operation, Product Scrap Preparation/Torch Cutting Operations, Maintenance Scrap Preparation/Torch Cutting Operations, Machine Shop Parts Heater, Chain Repair Furnace & Space and Water Heaters.

**B. Operational Restrictions**

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation. (Each month will establish a separate twelve-month period.)
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) (After Permit Issuance)	Allowable Total Cumulative Natural Gas Consumption (MMCF)
1	146
1-2	286
1-3	424
1-4	532
1-5	630
1-6	724
1-7	815
1-8	900
1-9	988
1-10	1080
1-11	1198
1-12	1318

After the first 12 calendar months of operation under this permit, compliance with the annual cubic feet limitation shall be based upon a rolling, twelve-month summation of the natural gas usage.

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Facility Name: Republic Engineered Steels, Inc. - Massillon H  
Facility ID: 15-76-13-0696  
Emissions Unit: 12 Mill Anneal (P081)

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information:
  - 1.a The total natural gas usage for all emissions units at the facility.
  - 1.b Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
  - 1.c During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

### D. Reporting Requirements

1. The permittee shall submit exceedance reports within 30 days following the end of each month during which an exceedance occurred that identify the following:
  - 1.a For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
  - 1.b After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling twelve-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year, showing the facility-wide total NOx emissions and the total amount of natural gas used during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3.)

### E. Testing Requirements

1. Compliance with the emission limitation(s) in Sections A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

### F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P081), in combination with B008, B009, P082 and some exempt from permitting equipment: A through F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 11/13/97

Facility ID: 15-76-13-0696

Expiration Date: 11/13/00

FINAL ISSUE

This document constitutes issuance for:

Republic Engineered Steels, Inc. - Massillon HRB  
410 Oberlin Road, SW  
Massillon, OH 44647-0000

of a permit to operate for:

P082 (18 Mill Reheat)  
18 Mill Reheat

### PART I General Terms & Conditions

#### 1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

#### 2. 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.

#### 3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

#### **4. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of three 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 the permit. Such records may be maintained in computerized form.

#### **5. 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 and federal 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.

#### **6. Scheduled Maintenance/Malfunction Reporting**

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

#### **7. Permit Transfers**

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

#### **8. 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.

#### **9. Permit Renewal**

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

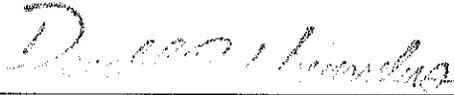
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Canton Division of Air Pollution Control  
420 Market Avenue N.  
Canton, OH 44702-1544  
(216) 489-3385

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate DO or LAA.

**10. The permittee is also subject to the attached special terms and conditions.**

OHIO ENVIRONMENTAL PROTECTION AGENCY



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Director

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Facility Name: Republic Engineered Steels, Inc. - Massillon H  
Facility ID: 15-76-13-0696  
Emissions Unit: 18 Mill Reheat (P082)

## Part II: Special Terms and Conditions

### A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
137 MMBtu/hr, natural gas fired reheat furnace, 18" mill reheat furnace (with stack)	OAC Rule 3745-35-07	(See Additional Terms & Conditions.)
(Same)	OAC Rule 3745-17-07(A)	Visible Emission Limit (See Additional Terms & Conditions 2.b.)
(Same)	OAC Rule 3745-17-11	No process weight can be determined; therefore, no applicable emission limit.

### 2. Additional Terms and Conditions

- 2.a The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be obtained by limiting the amount of natural gas burned at this facility. The burning of natural gas is the only source of NOx emissions.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B008, B009, P081, P082 and the following exempt equipment: 18" Mill Torch Cutting Operation, Product Scrap Preparation/Torch Cutting Operations, Maintenance Scrap Preparation/Torch Cutting Operations, Machine Shop Parts Heater, Chain Repair Furnace & Space and Water Heaters.

- 2.b Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

### B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling, twelve-month summation. (Each month will establish a separate twelve-month period.)

**B. Operational Restrictions (continued)**

3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) (After Permit Issuance)	Allowable Total Cumulative Natural Gas Consumption (MMCF)
1	146
1-2	286
1-3	424
1-4	532
1-5	630
1-6	724
1-7	815
1-8	900
1-9	988
1-10	1080
1-11	1198
1-12	1318

After the first 12 calendar months of operation under this permit, compliance with the annual cubic feet limitation shall be based upon a rolling, twelve-month summation of the natural gas usage.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain records which list the following information:
  - 1.a The total natural gas usage for all emissions units at the facility.
  - 1.b Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
  - 1.c During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

**D. Reporting Requirements**

1. The permittee shall submit exceedance reports within 30 days following the end of each month during which an exceedance occurred that identify the following:
  - 1.a For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage at this facility.
  - 1.b After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling, twelve-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3.)

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A of these terms & conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:

Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:

OAC Rule 3745-17-03 (B) (1), EPA Method nine (9)

**F. Miscellaneous Requirements**

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P082) in combination with P081, B008, B009 and other equipment exempt from permitting: A through F.