



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

10/2/2015

Certified Mail

Chris Potts
AK Steel Corporation
Oxford State Road
Middletown, OH 45044

Facility ID: 1409010006
Permit Number: P0105157
County: Butler

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, Journal News. 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 Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

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 Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

A handwritten signature in cursive script that reads "Michael E. Hopkins".

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
SWOAQA; Indiana; Kentucky

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Title V Permit Renewal

AK Steel Corporation

1801 Crawford Street, , Middletown, OH 45043-0001

ID#: P0105157

Date of Action: 10/2/2015

Permit Desc: Title V Renewal Permit for AK Steel Corporation, a steel manufacturing facility, including boilers, furnaces, coke oven, quenching, blast furnace, casting operations, and various ancillary and material handling operations..

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 ID # or: Paul Tedtman, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

Statement of Basis For Air Pollution Title V Permit

Facility ID:	1409010006
Facility Name:	AK Steel Corporation
Facility Description:	Steel Plant
Facility Address:	1801 Crawford Street, Middletown, OH 45043-0001
Permit #:	P0105157, Renewal
This facility is subject to Title V because it is major for: <input type="checkbox"/> Lead <input checked="" type="checkbox"/> Sulfur Dioxide <input checked="" type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input checked="" type="checkbox"/> Nitrogen Oxides <input checked="" type="checkbox"/> Particulate Matter ≤ 10 microns <input checked="" type="checkbox"/> Single Hazardous Air Pollutant <input checked="" type="checkbox"/> Combined Hazardous Air Pollutants <input checked="" type="checkbox"/> Maximum Available Control Technology Standard(s) <input checked="" type="checkbox"/> GHG <input type="checkbox"/> 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. The insignificant emissions units (IEUs) that have applicable state and/or federally-enforceable requirements are included in the terms and conditions in Section B. All other IEUs at this facility are excluded from the requirements to obtain installation or operating permits pursuant to OAC rules 3745-15-05 and 3745-31-03 and have no applicable federally enforceable requirements; therefore, these IEUs are not included in the terms and conditions of this permit pursuant to OAC rule 3745-77-07(A)(13).
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	N/A



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

modification per OAC rule 3745-77-08(C)(3)	
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)	This permit renewal action incorporates several new federal rule applicability requirements for NESHAP rules as noted in Section B. of the permit terms and in Section C. for each of the affected emissions units. This permit renewal also incorporates several PTI actions since the 2004 Title V issuance which are included by reference (PTI #) in the specific emissions unit terms and conditions for EU P096 and T021 in Section C. of the permit.
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.	A CAM Plan is required for emissions units P901, P925, and P024 based on potential pre-control device emissions of particulate that are greater than 100 TPY. The particulate emissions and/or control devices employed to reduce particulate emissions are not subject to the listed NESHAP regulations, therefore CAM is applicable to these sources since the emissions unit must comply with an applicable particulate emission limitation. For emissions unit P925, the scrubber controlling the direct blast furnace gas emissions is not subject to NESHAP Subpart FFFF based on 63.7782(c), therefore CAM applies to the scrubber, but not to the casthouse operations/emissions and control devices on this emission unit which are subject to Subpart FFFF [ref 64.2(b)(1)(i)].

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.	77-07(A)(13)	N	Listing of insignificant emissions units that are subject to SIP-approved and/or federal regulations.
B.3. - B.4.	-109	N	Terms and conditions for emissions units located at the facility subject to the Clean Air Interstate Rule (CAIR) and any subsequent federal programs. Emissions units P009-P012 are subject to CAIR.
B.5.	N	40 CFR Part 64	Clarifying term for emissions units that are subject to the CAM rules in 40 CFR Part 64. Emissions units P901, P925, and P024 are subject to CAM based upon the uncontrolled potential to emit for particulate.
B.6	N	40 CFR Part 61 and Part 63	Clarifying and reference term for rule applicability determination regarding emissions units contained in the permit subject to National Emission Standards for Hazardous Air Pollutants (NESHAP).



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										
B918 Coke Oven Doors	Not more than 3.3% leaking coke oven doors	N	40 CFR Part 63 Subpart L	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
B918 Coke Oven Doors	No visible fugitive particulate emissions from more than 10% of the oven doors	17-07(B)(2)(d)(ii)	N	N	N	Y	N	Y	Y	Y	N	N	
B918 Topside lids	Not more than 0.4% leaking topside port lids	N	40 CFR Part 63 Subpart L	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
B918 Topside lids	No visible fugitive particulate emissions from more than 5% of the charging hole	17-07(B)(2)(c)	N	N	N	Y	N	Y	Y	Y	N	N	



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	lids												
B918 Offtake	Not more than 2.5% leaking offtake systems	N	40 CFR Part 63 Subpart L	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
B918 Offtake	No visible fugitive particulate emissions from more than 10% of the offtake piping	17-07(B)(2)(b)	N	N	N	Y	N	Y	Y	Y	N	N	
B918 Charging	Not more than 12 seconds of visible emission per charge	N	40 CFR Part 63 Subpart L	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
B918 Charging	No visible fugitive particulate emissions from any charging operation except for a period to time not to exceed 125 seconds during any 5 consecutive charges	17-07(B)(2)(a)	N	N	N	Y	N	Y	Y	Y	N	N	



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

B918 bypass bleeder stacks	No visible emissions except for periods not to exceed 5 minutes during any 2 consecutive hours	N	40 CFR Part 63 Subpart L	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
B918 Collecting Mains	Work practice requirements	N	40 CFR Part 63 Subpart L	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule. ET: Not applicable. Work practice requirements and record keeping.
B918 Combustion Stack	Opacity shall not exceed 15% on normal cycle, or 20% on extended cycle	N	40 CFR Part 63 Subpart CCCCC	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
B918 Combustion Stack	Visible particulate emissions from the combustion stack shall not exceed 45% opacity, as a 6 minute avg	17-07(C) 17-07(A)(1) 17-07(A)(3)(i)	N	Y	N	Y	N	Y	Y	Y	N	N	ND: Permittee granted an equivalent visible particulate emissions limitation per OAC rule 3745-17-07(C) in lieu of the 20% opacity requirements under OAC rule 3745-17-07(A)(1)
B918 Combustion Stack	PE shall not exceed 0.18 lb/MMBtu	17-10(C)(1)	N	N	N	N	N	N	N	Y	N	N	M, R, Rp: Compliance will be demonstrated by stack emissions testing performed using EPA-approved methods
B918	280 gr	18-	N	N	N	Y	N	Y	Y	N	N	N	ET: Daily gas sampling, record keeping, and



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

Combustion Stack	hydrogen sulfide/100 dscf of coke oven gas	15(C)(3)(a)												reporting requirements are used to demonstrate compliance. If required, stack emissions testing will be conducted.
B918 Pushing	Particulate shall not exceed 0.02 lb/ton of coke	N	40 CFR Part 63 Subpart CCCCC	N	Y	Y	N	Y	Y	Y	N	N		OR: Permit terms include operational/work practice requirements specified in the federal rule.
B918 Pushing	Visible particulate emissions shall not exceed 20% opacity above the battery top	17-07(B)(2)(e)	N	N	N	Y	N	Y	Y	Y	N	N		
B918 Pushing	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6 min avg	17-07(A)(1)	N	N	N	Y	N	Y	Y	Y	N	N		
B918	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	N	N	N	N	N	N	N		M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the federal NESHAP rules, Subpart L and Subpart CCCCC, which are more stringent.
F001	No visible particulate emissions	17-07(B)(4)	N	N	N	Y	N	Y	Y	N	N	N		ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures. If required, compliance



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	from paved roads/parking areas except for period not to exceed 6 minutes during any 60-minute period												shall be demonstrated by Method 22 visible emissions observations.
F001	No visible particulate emissions from unpaved roads/parking areas except for period not to exceed 13 minutes during any 60-minute period	17-07(B)(5)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures. If required, compliance shall be demonstrated by Method 22 visible emissions observations.
F002	No visible particulate emissions from any material storage pile except for period not to exceed 13 minutes during any 60-minute period	17-07(B)(6)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures. If required, compliance shall be demonstrated by Method 22 visible emissions observations.
F012, F015, F021, P019, P022, P062, P065, P094	Visible particulate emissions of fugitive dust shall not	17-07(B)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures. If required, compliance shall be demonstrated by Method 9 visible emissions observations.



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	exceed 20% opacity as a 3 min avg													
F001, F002, F012, F015, F021, P019, P022, P062, P065, P094	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	Y	N	Y	Y	N	N	N		ET: Compliance is demonstrated by inspections, record keeping, reporting, and the use of control measures.
F011, P047	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6 min avg	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N		M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart FFFFF, which is more stringent. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
F011, F025, P047	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3 min avg	17-07(B)(1)	N	N	N	N	N	N	N	N	N	N		M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart FFFFF, which is more stringent. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
F011, F025, P047	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	N	N	N	N	N	N	N		M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the requirements in the federal NESHAP rule, Subpart FFFFF, which is more stringent.
F011	PE shall not	17-11(B)	N	N	N	N	N	N	N	N	N	N		M, R, Rp, ET: The requirements of this OAC rule



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	exceed 20.4 lbs/hour from all stacks combined												are met by compliance with the emission limitations, monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart FFFFF, which is more stringent.
F011, P047	Baghouse outlet shall achieve 0.01 grain PE/dscf	N	40 CFR Part 63 Subpart FFFFF	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
F021	PE shall not exceed 180.8 lbs/hr; PM10 shall not exceed 54.4 lbs/hr	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly emission limitation is based on the emissions unit's potential to emit at the maximum hourly coking production rates and US EPA AP-42 emission factors. All requirements for this EU have been transferred from the PTI.
F021	PE shall not exceed 24.69 TPY as a rolling 12-month summation; PM10 shall not exceed 7.43 TPY as a rolling 12-month summation	N	OAC rule 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on maximum number of pushes per year to demonstrate compliance with emission limitations. ET: The emission limitations are based on the operational restrictions and US EPA AP-42 emission factors. Compliance with emission limitation determined by monitoring and record keeping requirements. All requirements for this EU have been transferred from the PTI.
F021	Employ clean quench water with a TDS concentration equal to or less than 1500 mg/L	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the federal NESHAP rule, Subpart CCCCC, which is more stringent.



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

F021	Employ clean quench water with a TDS concentration equal to or less than 1100 mg/L	N	40 CFR Part 63 Subpart CCCCC	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
F025	PE shall not exceed 7.5 lbs/hr; PM10 shall not exceed 7.5 lbs/hr	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly emission limitation is based on the emissions unit's potential to emit at the maximum hourly production rates and permittee-supplied emission factors. All requirements for this EU have been transferred from the PTI.
F025	PE shall not exceed 0.98 TPY as a rolling 12-month summation; PM10 shall not exceed 0.98 TPY as a rolling 12-month summation	N	OAC rule 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms contain restriction on the maximum hot metal production rate per year to demonstrate compliance with emission limitations. ET: The emission limitations are based on the operational restrictions and permittee-supplied emission factors. Compliance with emission limitation determined by monitoring and record keeping requirements. All requirements for this EU have been transferred from the PTI.
F025	Secondary emissions shall not exceed 20% opacity as 3 min avg	N	40 CFR Part 63 Subpart FFFFF	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
G001	Stage I VOC control efficiency shall be at least	21-09(R) 21-09(DDD)	N	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the state OAC rule.



	90%; Stage II VOC control efficiency shall be at least 95%												
P019, P022	Exempt	17-07(A)(1) 17-11	N	Y	N	N	N	N	N	N	N	N	ND: EU is exempt from stack opacity requirements in OAC rule 3745-17-07(A) since it is not subject to requirements of OAC 3745-17-11 [ref: 3745-17-07(A)(3)(h)]. EU is not subject to OAC rule 3745-17-11 because the uncontrolled mass PE rate from natural gas combustion is less than 10 lbs/hr and the process weight rate is zero.
P019 Oil Application	Coating VOC content limitations: 3.3 lbs VOC/gal for rust preventive oils; 1.2 lbs VOC/gal for anti-galling materials; and 0.8 lbs VOC/gal for prelude oils.	21-09(OO)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance with emission limitations determined by monitoring, record keeping, and reporting requirements for coatings employed.
P019, P022 Indirect-fired Furnace	PE shall not exceed 0.020 lb/MMBtu	17-10(B)(1)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The emission limitation is greater than the emissions unit's potential to emit based on US EPA AP-42 emission factors for natural gas combustion.
P019, P022 Indirect-fired Furnace	Work practice standards	N	40 CFR Part 63 Subpart DDDDD	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule. ET: Federal rule contains no emission testing requirements for natural gas combustion sources.
P022 Oil Application;	Coating VOC content	21-09(OO)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance with emission limitations determined by monitoring, record keeping, and



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

P062 EG Line	limitations: 3.3 lbs VOC/gal for rust preventive oils; and 0.8 lbs VOC/gal for prelube oils.													reporting requirements for coatings employed.
P043	Visible particulate emissions shall not exceed 20% opacity as 6 min avg	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart CCCCC. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
P043	PE shall not exceed 64.8 lbs/hr	17-11(B)(1)	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart CCCCC, which is more stringent based on the TDS limitation.
P043	Employ clean quench water with a TDS concentration equal to or less than 1100 mg/L	N	40 CFR Part 63 Subpart CCCCC	N	Y	Y	N	Y	Y	Y	N	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
P047	PE shall not exceed 50 lbs/hour from all stacks combined	17-11(B)	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the emission limitations, monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart FFFFF, which is more stringent.
P047	SO2	18-15(C)(10)	N	N	Y	Y	N	Y	Y	Y	N	N	N	OR: Permit terms include operational requirement



	emissions shall not exceed 0.40 lb of SO2 per ton of product												specified in the state OAC rule.
P062, P065	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6 min avg	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
P062	PE shall not exceed 5.36 pounds PE per hour and 23.5 tons per year. PM ₁₀ shall not exceed 4.22 pounds PM ₁₀ per hour and 18.5 tons per year.	N	OAC rule 3745-31-05(A)(3)	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms contain operational requirement to vent selected operations to a scrubber. All requirements for this EU have been transferred from the PTI.
P062	VOC emissions shall not exceed 7.5 pounds per hour and 32.9 tons per year.	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emission limitations are based on the emissions unit's potential to emit at the maximum hourly production rates and permittee-supplied emission factors, assuming 8,760 hours per year operation. If required, stack emissions testing will be conducted using EPA-approved methods. All requirements for this EU have been transferred from the PTI.



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

P065	PE shall not exceed 74.9 lbs/hr	17-11(B)	N	N	N	N	N	N	N	Y	N	N	M, R, Rp: Compliance will be demonstrated by stack emissions testing performed using EPA-approved methods
P065, P094	Rolling oil VOC content shall not exceed 6.9 lbs VOC/gal	21-09(OO)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance with emission limitations determined by monitoring, record keeping, and reporting requirements for rolling oil employed.
P067	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6 min avg	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
P067	280 gr hydrogen sulfide/100 dscf of coke oven gas	18-15(C)(8)	N	N	N	Y	N	Y	Y	N	N	N	ET: Daily gas sampling, record keeping, and reporting requirements are used to demonstrate compliance. If required, stack emissions testing will be conducted.
P068	Benzene emissions 10,000 ppm from an exhauster shall constitute a leak	N	40 CFR Part 61, Subpart L and Subpart V	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule. ET: Not applicable. Work practice and monitoring requirements and record keeping demonstrate compliance.
P070	Control system shall be designed and operated for no	N	40 CFR Part 61, Subpart L and Subpart	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	detectable emissions. No (zero) emissions from the final coolers or final-cooler cooling towers.		V										
P070, P075, P096, T021	Exempt – total annual benzene quantity from facility waste less than 11 TPY	N	40 CFR Part 61, Subpart FF	Y	N	Y	N	Y	Y	N	N	N	ND: The total annual benzene quantity from facility waste is less than 10 megagrams (Mg) per year (11 tons per year), therefore the permittee is exempt from the general standards in 40 CFR 61.342(b) and (c) of Subpart FF pursuant to 40 CFR 61.342(a). M, R, Rp reqd to demonstrate compliance with exemption. ET: Not applicable. Monitoring requirements and record keeping demonstrate compliance.
P075, P096, T021	Control system shall be designed and operated for no detectable emissions.	N	40 CFR Part 61, Subpart L and Subpart V	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
P096	VOC emissions shall not exceed 0.256 lb/hr and 1.12 TPY	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emission limitations are based on the emissions unit's potential to emit at the maximum hourly coking production rates and US EPA AP-42 emission factors. All requirements for this EU have been transferred from the PTI.



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

P901 Truck and railcar unloading; Conveyor and transfer points	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3 min avg	17-07(B)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
P901 Truck and railcar unloading	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by inspections, record keeping, reporting, and the use of control measures.
P901 Conveyor and transfer points	Employ reasonably available control measures (RACM); baghouse outlet 0.030 grain PE/dscf	17-08(B)	N	N	N	Y	N	Y	Y	Y	N	N	
P901 Conveyor and transfer points	Visible emissions from any stack shall not exceed 20% opacity as 6 min avg	17-07(A)(1)	N	N	N	N	N	N	N	Y	N	N	M, R, Rp: Compliance will be demonstrated by stack emissions testing performed using EPA-approved methods
P901 Conveyor and transfer points	Compliance Assurance Monitoring (CAM)	N	40 CFR Part 64	N	N	Y	N	Y	Y	Y	N	N	Permit terms and conditions identify baghouse pressure drop as CAM Plan indicator to assure compliance with particulate limitation.



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

P902 Hot metal transfer to tundish; torch cutting operation	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3 min avg	17-07(B)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
P902 Hot metal transfer to tundish; torch cutting operation	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by inspections, record keeping, reporting, and the use of control measures.
P902 Casting machine	Visible emissions from any stack shall not exceed 20% opacity as 6 min avg	17-07(A)(1)	N	N	N	N	N	N	N	Y	N	N	M, R, Rp: Compliance will be demonstrated by stack emissions testing performed using EPA-approved methods
P902 Casting machine	PE from all stacks shall not exceed 73.0 lbs/hr	17-11(B)	N	N	N	N	N	N	N	Y	N	N	M, R, Rp: Compliance will be demonstrated by stack emissions testing performed using EPA-approved methods
P925	Visible emissions from any stack shall not exceed 20% opacity as 6 min avg	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: If required, compliance will be demonstrated by stack emissions testing performed using EPA-approved methods
P925	PE from all stacks shall	17-11(B)	N	N	N	N	N	N	N	Y	N	N	M, R, Rp: Compliance will be demonstrated by stack emissions testing performed using EPA-



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	not exceed 73.0 lbs/hr												approved methods
P925	Compliance Assurance Monitoring (CAM)	N	40 CFR Part 64	N	N	Y	N	Y	Y	Y	N	N	Permit terms and conditions identify scrubber pressure drop and water flow rates as CAM Plan indicators to assure compliance with particulate limitation.
P925 Casthouse	Secondary emissions shall not exceed 20% opacity as a 6 min avg	17-07(B)(3)	40 CFR Part 63, Subpart FFFFF	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
P925 Casthouse; Non casthouse fugitive emissions	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	Y	N	Y	Y	Y	N	N	
P925 Casthouse	Control device outlet shall not exceed 0.01 grain/dscf of PE	N	40 CFR Part 63, Subpart FFFFF	N	Y	Y	N	Y	Y	Y	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule.
P925 Non casthouse fugitive emissions	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3 min avg	17-07(B)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
P934	PE shall not exceed 1.92	N	OAC rule	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emission limitations are based on the emissions unit's



	lbs/hr and 9.1 TPY		3745-31-05(A)(3)										potential to emit at the maximum hourly production rates and permittee-supplied emission factors. If required, stack emissions testing will be conducted using EPA-approved methods. All requirements for this EU have been transferred from the PTI.
P934	PE shall not exceed 0.02 grain/dscf from the baghouse outlet; particulate capture design efficiency of 95%	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the emission limitations, monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart FFFFF, which is more stringent. All requirements for this EU have been transferred from the PTI.
P934	CO emissions shall not exceed 100 lbs/day and 20 TPY	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The hourly and annual emission limitations are based on the emissions unit's potential to emit at the maximum hourly production rates and permittee-supplied emission factors. If required, stack emissions testing will be conducted using EPA-approved methods. All requirements for this EU have been transferred from the PTI.
P934	Visible particulate emissions from baghouse outlet shall not exceed 5% opacity as 6 min avg	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	Y	N	N	M, R, Rp: Compliance will be demonstrated by emissions testing performed using EPA-approved methods All requirements for this EU have been transferred from the PTI.
P934	Visible	N	OAC	N	N	N	N	N	N	Y	N	N	M, R, Rp: Compliance will be demonstrated by



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	particulate emissions of fugitive dust from vacuum degas building shall not exceed 6% opacity as 6 min avg		rule 3745-31-05(A)(3)											emissions testing performed using EPA-approved methods All requirements for this EU have been transferred from the PTI.
P934, P956	PE shall not exceed 0.01 grain/dscf from the baghouse outlet	N	40 CFR Part 63, Subpart FFFFF	N	Y	Y	N	Y	Y	Y	N	N		OR: Permit terms include operational/work practice requirements specified in the federal rule.
P935	Visible emissions from any stack shall not exceed 20% opacity as 6 min avg	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N		ET: Compliance is demonstrated by visible emissions monitoring and record keeping. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
P935	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3 min avg	17-07(B)(1)	N	N	N	Y	N	Y	Y	N	N	N		ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
P935	Employ reasonably available control measures	17-08(B)	N	N	N	Y	N	Y	Y	Y	N	N		



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	(RACM); baghouse outlet 0.030 grain PE/dscf												
P935	PE shall not exceed 73.1 lbs/hr	17-11(B)	N	N	N	N	N	N	N	Y	N	N	M, R, Rp: Compliance will be demonstrated by emissions testing performed pursuant to terms and conditions for EU P934 using EPA-approved methods (shared baghouse with EU P934)
P956	Visible emissions from any stack shall not exceed 20% opacity as 6 min avg	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: If required, compliance will be demonstrated by stack emissions testing performed using EPA-approved methods
P956	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3 min avg	17-07(B)(1)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: If required, compliance will be demonstrated by stack emissions testing performed using EPA-approved methods
P956	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the emission limitations, monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart FFFFF, which is more stringent.
P956	SO2 emissions shall not exceed 0.29 lb	18-15(C)(9)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The emission rate is based on the emissions unit's potential to emit at the maximum hourly production rates and permittee-supplied emission factors. If required, stack emissions



	SO2/ton of product												testing will be conducted using EPA-approved methods.
T021	VOC emissions shall not exceed 4.39 TPY	N	OAC rule 3745-31-05(A)(3)	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The emission rate is based on the emissions unit's potential to emit using US EPA AP-42 emission factors for gas blanketing which is required pursuant to 40 CFR Part 63, Subpart FFFFF. The requirements of this OAC rule are met by compliance with the emission limitations, monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart FFFFF. All requirements for this EU have been transferred from the PTI.
T021	Exempt – storage requirements	21-09(L)	N	Y	Y	Y	N	Y	Y	N	N	N	ND: This OAC rule does not apply since the tar liquid stored in this EU has a true vapor pressure less than 1.52 psia. M, R, Rp is required to demonstrate compliance with exemption. ET: Not applicable. Monitoring requirements and record keeping demonstrate compliance.
B021, B022, B023, B026	Visible emissions from any stack shall not exceed 20% opacity as 6 min avg	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: If required, compliance will be demonstrated by stack emissions testing performed using EPA-approved methods
B021, B022, B023, B026	PE shall not exceed 0.020 lb/MMBtu	17-10(B)(1)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The emission limitation is greater than the emissions unit's potential to emit based on US EPA AP-42 emission factors for natural gas combustion.
B021, B022, and B023	SO2 emissions shall not	18-15(C)(6)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Combustion of natural gas only, therefore potential to emit is less than emission limitation based upon OAC rule 3745-18-04(F)(4).



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	exceed 0.50 lb/MMBtu												
B026	SO2 emissions shall not exceed 1.6 lbs/MMBtu	18-15(C)(7)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Combustion of natural gas only, therefore potential to emit is less than emission limitation based upon OAC rule 3745-18-04(F)(4).
B021, B022, B023, B026	Work practice standards	N	40 CFR Part 63, Subpart DDDDD	N	Y	Y	N	Y	Y	N	N	N	OR: Permit terms include operational/work practice requirements specified in the federal rule. ET: Federal rule contains no emission testing requirements for natural gas combustion sources.
P926, P927	Visible emissions from any stack shall not exceed 20% opacity as 6 min avg	17-07(A)(1)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: If required, compliance will be demonstrated by stack emissions testing performed using EPA-approved methods
P926, P927	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3 min avg	17-07(B)(1)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the emission limitations, monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart FFFFF.
P926, P927	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the emission limitations, monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart FFFFF, which is more stringent.
P926, P927	PE shall not exceed 71.8	17-11(B)	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: The requirements of this OAC rule are met by compliance with the emission limitations,



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	lbs/hr													monitoring, record keeping, reporting, and testing requirements in the federal NESHAP rule, Subpart FFFFF, which is more stringent.
P926, P927	PE shall not exceed 0.03 grain/dscf from scrubbers during the primary oxygen blow	N	40 CFR Part 63, Subpart FFFFF	N	Y	Y	N	Y	Y	Y	N	N		OR: Permit terms include operational/work practice requirements specified in the federal rule.
P926, P927	PE shall not exceed 0.01 grain/dscf from the baghouse outlet	N	40 CFR Part 63, Subpart FFFFF	N	Y	Y	N	Y	Y	Y	N	N		OR: Permit terms include operational/work practice requirements specified in the federal rule.
P926, P927	Secondary emissions shall not exceed 20% opacity as 3 min avg.	N	40 CFR Part 63, Subpart FFFFF	N	Y	Y	N	Y	Y	Y	N	N		OR: Permit terms include operational/work practice requirements specified in the federal rule.
B007, B008, B009, B010	Visible emissions from any stack shall not exceed 20% opacity as 6 min avg	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N		ET: Compliance is demonstrated by visible emissions monitoring and record keeping. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
B007, B008, B009, B010	PE from blast furnace gas combustion shall not exceed 0.040	17-10(B)(1)	N	N	N	N	N	N	N	N	N	N		M, R, Rp, ET: The emission limitations are greater than the emissions unit's potential to emit based on US EPA AP-42 emission factors for natural gas and blast furnace gas combustion. If required, compliance will be demonstrated by stack



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	lb/MMBtu; PE from natural gas combustion shall not exceed 0.020 lb/MMBtu													emissions testing performed using EPA-approved methods.
B007, B008, B009, B010	SO2 emissions shall not exceed 0.90 lb/MMBtu	18-15(C)(1)	N	N	N	N	N	N	N	N	Y	N	N	M, R, Rp, ET: For the combustion of natural gas, the potential to emit is less than emission limitation based upon OAC rule 3745-18-04(F)(4). For the combustion of blast furnace gas, the potential to emit based upon AP-42 emission factors is less than the emission limitation, however, stack emission testing when combusting blast furnace gas is required to confirm compliance with emissions rate.
B007, B008, B009, B010	Exempt per 63.7491(k)	N	40 CFR Part 63, Subpart DDDDD	Y	N	Y	N	Y	Y	N	N	N	N	ND: This rule does not apply if the EU receives more than 90% of total annual gas volume from blast furnace gas. M, R, Rp is required to demonstrate compliance with exemption. ET: Not applicable. Monitoring requirements and record keeping demonstrate compliance.
B027, B028, B029, B030, B031, B032	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3 min avg	17-07(B)(1)	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: If required, compliance will be demonstrated by emissions testing performed using EPA-approved methods.
B027, B028, B029, B030, B031, B032	Employ reasonably available	17-08(B)	N	N	Y	Y	N	Y	Y	N	N	N	N	OR: Use of only natural gas. ET: Not applicable. Monitoring requirements and record keeping demonstrate compliance.



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	control measures (RACM)												
B027, B028, B029, B030, B031, B032	Exempt from SO2 emission limitations	18-06	N	Y	N	N	N	N	N	N	N	N	ND: There is no applicable SO ₂ emission limitation from OAC rule 3745-18-06 because the EU burns only natural gas, is not fuel burning equipment as defined in OAC rule 3745-18-01(B)(4), and the process weight rate, as defined in OAC rule 3745-18-01(B)(14), is equal to zero.
F003, F004, F005, F008, F010	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3 min avg	17-07(B)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
F003, F004, F005, F008, F010	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures.
P023, P024	Visible emissions from any stack shall not exceed 20% opacity as 6 min avg	17-07(A)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
P023, P024	Visible particulate	17-07(B)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

	emissions of fugitive dust shall not exceed 20% opacity as a 3 min avg													use of control measures. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
P023, P024	Employ reasonably available control measures (RACM); baghouse outlet 0.030 grain PE/dscf	17-08(B)	N	N	N	Y	N	Y	Y	Y	N	N		
P023, P024	VOC content shall not exceed 3.3 lbs VOC/gal for rust preventive oils	21-09(OO)(2)	N	N	N	Y	N	Y	Y	N	N	N		ET: Not applicable. Monitoring requirements and record keeping demonstrate compliance.
P023, P024	HCl emissions shall not exceed 18 ppmv or the HCl emission rate shall not have a collection efficiency of less than 97%	N	40 CFR Part 63, Subpart CCC	N	Y	Y	N	Y	Y	Y	N	N		OR: Permit terms include operational/work practice requirements specified in the federal rule.
P024 Tension Leveler	Compliance Assurance Monitoring (CAM)	N	40 CFR Part 64	N	N	Y	N	Y	Y	Y	N	N		Permit terms and conditions identify baghouse pressure drop as CAM Plan indicator to assure compliance with particulate limitation.



Statement of Basis
 AK Steel Corporation
 Permit Number: P0105157
 Facility ID: 1409010006

P009, P010, P011, P012	Not applicable	17-07(A)(1)	N	Y	N	N	N	N	N	N	N	N	ND: OAC rule 3745-17-11 Table I does not apply because the process weight is equal to zero as defined in OAC rule 3745-17-01(B)(4). OAC rule 3745-17-11 Figure II does not apply because the uncontrolled mass rate of particulate emissions is less than 10 pounds per hour as per OAC rule 3745-17-11(A)(2)(a)(ii).
P009, P010, P011, P012	Not applicable	17-11(A)	N	Y	N	N	N	N	N	N	N	N	ND: Because OAC rule 3745-17-11 does not apply, the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) do not apply.
P009, P010, P011, P012	SO2 emissions shall not exceed 1.1 lbs/MMBtu	18-15(C)(2)	N	N	Y	Y	N	Y	Y	N	N	N	OR: Fuel sulfur content limitation ET: Fuel monitoring, record keeping, and reporting requirements demonstrate compliance with limitation. If required, compliance will be demonstrated by emissions testing performed using EPA-approved methods.
P091, P092, P093, P095	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3 min avg	17-07(B)(1)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures. If required, compliance shall be demonstrated by Method 9 visible emissions observations.
P091, P092, P093, P095	Employ reasonably available control measures (RACM)	17-08(B)	N	N	N	Y	N	Y	Y	N	N	N	ET: Compliance is demonstrated by visible emissions monitoring and record keeping and the use of control measures.
P091, P092, P095	Rolling oil VOC content shall not exceed 6.9 lbs	21-09(OO)	N	N	N	Y	N	Y	Y	N	N	N	ET: Not applicable. Monitoring requirements and record keeping demonstrate compliance.



Statement of Basis
 AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

	VOC/gal; VOC content shall not exceed 3.3 lbs VOC/gal for rust preventive oils													
P093	Rolling oil VOC content shall not exceed 6.9 lbs VOC/gal	21-09(OO)	N	N	N	Y	N	Y	Y	N	N	N	ET: Not applicable. Monitoring requirements and record keeping demonstrate compliance.	



DRAFT

**Division of Air Pollution Control
Title V Permit
for
AK Steel Corporation**

Facility ID:	1409010006
Permit Number:	P0105157
Permit Type:	Renewal
Issued:	10/2/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
AK Steel Corporation

Table of Contents

Authorization	1
A. Standard Terms and Conditions	2
1. Federally Enforceable Standard Terms and Conditions	3
2. Monitoring and Related Record Keeping and Reporting Requirements.....	3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance.....	6
4. Risk Management Plans	7
5. Title IV Provisions	7
6. Severability Clause	7
7. General Requirements	7
8. Fees.....	8
9. Marketable Permit Programs.....	8
10. Reasonably Anticipated Operating Scenarios	9
11. Reopening for Cause	9
12. Federal and State Enforceability	9
13. Compliance Requirements	9
14. Permit Shield	11
15. Operational Flexibility.....	11
16. Emergencies.....	12
17. Off-Permit Changes	12
18. Compliance Method Requirements	12
19. Insignificant Activities or Emissions Levels.....	13
20. Permit to Install Requirement.....	13
21. Air Pollution Nuisance	13
22. Permanent Shutdown of an Emissions Unit	13
23. Title VI Provisions	13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only	14
25. Records Retention Requirements Under State Law Only.....	14
26. Inspections and Information Requests	14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements.....	15
28. Permit Transfers	15



29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	15
30. Submitting Documents Required by this Permit	16
B. Facility-Wide Terms and Conditions.....	17
C. Emissions Unit Terms and Conditions	22
1. B918, No.2 Coke Plant.....	23
2. F001, Roads & Parking Areas.....	39
3. F002, RM Storage Piles	44
4. F011, BOF Deslagger	49
5. F012, BF Raw Materials Handling.....	56
6. F015, Slab Scarfing/Slitting	60
7. F021, Backup Quench Station	63
8. F025, Backup Skimmer.....	71
9. G001, Plantwide Gasoline.....	77
10. P019, No. 4 Coating Line	81
11. P022, No. 3 Coating Line	88
12. P043, Wilputte Quench Tower	95
13. P047, HMT/Desulfurization Station	99
14. P062, No. 2 EG Line	107
15. P065, No. 3 Cold Mill	116
16. P067, Gas Holder/Flare	123
17. P068, Wilputte Exhausters	127
18. P070, Final Cooler, Wash Oil Tank & Wash Oil Decanter	130
19. P075, Wilputte Tar & Flushing Liquor Vessels.....	134
20. P094, Hot Strip Mill	138
21. P096, Wilputte Tar Decanter Tank.....	142
22. P901, Flux Handling.....	148
23. P902, Continuous Caster	157
24. P925, No. 3 Blast Furnace	163
25. P934, CAS/OB.....	179
26. P935, Vacuum Degasser	187
27. P956, Desulfurization Station	193
28. T021, Tar Storage Tank.....	201
29. Emissions Unit Group - Annealing: B021, B022, B023, and B026	207
30. Emissions Unit Group - Basic Oxygen Furnace Vessels: P926 and P927	212
31. Emissions Unit Group - Boiler House #2: B007, B008, B009, and B010.....	221
32. Emissions Unit Group - Ladle & Tundish Preheating: B027, B028, B029, B030, B031, and B032.....	228



33. Emissions Unit Group - Materials Handling: F003, F004, F005, F008, and F010	230
34. Emissions Unit Group - Pickling Lines: P023 and P024	233
35. Emissions Unit Group - Slab Reheat Furnaces: P009, P010, P011, and P012.....	247
36. Emissions Unit Group - Temper Mills / Winding: P091, P092, P093, and P095.....	251



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1409010006
Facility Description: Steel Plant
Application Number(s): A0028087, A0028088, A0036445, A0045527, A0045883
Permit Number: P0105157
Permit Description: Title V Renewal Permit for AK Steel Corporation, a steel manufacturing facility, including boilers, furnaces, coke oven, quenching, blast furnace, casting operations, and various ancillary and material handling operations.
Permit Type: Renewal
Issue Date: 10/2/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0096473

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

AK Steel Corporation
1801 Crawford Street
Middletown, OH 45043-0001

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

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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 Southwest Ohio Air Quality Agency. 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



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006
Effective Date: To be entered upon final issuance

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 recordings for 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 submitted scheduled maintenance requests, 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 Southwest Ohio Air Quality Agency. 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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 permit except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.

- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

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

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

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

9. Marketable Permit Programs

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

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

10. Reasonably Anticipated Operating Scenarios

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

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

11. Reopening for Cause

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

12. Federal and State Enforceability

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

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

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Southwest Ohio Air Quality Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (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 Southwest Ohio Air Quality Agency) 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 intermittent consistent 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 Southwest Ohio Air Quality Agency 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 Southwest Ohio Air Quality Agency 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, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

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

23. Title VI Provisions

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



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping information shall be submitted to the Southwest Ohio Air Quality Agency.
- 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 Southwest Ohio Air Quality Agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

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

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

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

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Southwest Ohio Air Quality 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 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 Southwest Ohio Air Quality Agency 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.



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

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 of an 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 Southwest Ohio Air Quality Agency, 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.



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006
Effective Date: To be entered upon final issuance

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. 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, and 3745-31, and/or 40 CFR Part 60 or 63:

F030	Coke Conveyor (from SunCoke to railcar loadout) [PTI P0108952]
P098	250 hp diesel emergency water pump – Well #30 [PBR14164]
P099	170 hp diesel emergency water pump – Well #37 [PBR14164]
P100	200 hp diesel emergency water pump – Well #41 [PBR14164]
P101	80 hp diesel emergency water pump – Scale Pits #1 and #2 [PBR14164]
P102	80 hp diesel emergency water pump (Upper) – Scale Pit #3 [PBR14164]
P103	80 hp diesel emergency water pump (Lower) – Scale Pit #3 [PBR14164]
P104	460 hp diesel emergency compressor – Byproducts Engine Rm Unit 1 [PBR14164]
P105	460 hp diesel emergency compressor – Byproducts Engine Rm Unit 2 [PBR14164]
P106	460 hp diesel emergency compressor – #2 Boiler House Unit 1 [PBR14164]
P107	510 hp diesel emergency compressor – #2 Boiler House Unit 2 [PBR14164]
P108	470 hp diesel emergency generator – #3 Boiler House [PBR14164]
P109	300 hp diesel emergency generator – Wicoff Gate 1 [PBR14164]
P110	300 hp diesel emergency generator – Wicoff Gate 2 [PBR14164]
P111	250 hp diesel emergency water pump – Well #34 [PBR14164]
P119	117 hp diesel emergency water pump - Coke Conveyor [PBR13325]
P120	114 hp diesel emergency generator – Blast Furnace Stockhouse, Door 407 [PBR13325]
P121	125 hp diesel emergency generator – Blast Furnace Pump House, Door 409 [PBR13325]
P122	120 hp diesel emergency water pump - Wicoff Gate [PBR13325]
P123	66 hp diesel emergency air compressor - East Battery [PBR13325]



P124	250 hp diesel emergency air compressor - Roundhouse [PBR13325]
P125	250 hp diesel emergency air compressor - Material handling [PBR13325]
P126	197 hp diesel emergency water pump - Coke Plant, Door 442 [PBR13325]
P127	574 hp diesel emergency generator – #4 Aluminize Line [PBR13325]
P128	755 hp diesel emergency generator – #2 Boiler House [PBR14165]

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

3. The permittee shall ensure that any CAIR NO_x, SO₂, or NO_x ozone season units comply with the requirements of OAC 3745-109, which includes submitting timely permit applications. The permittee shall ensure that the affected emissions units comply with those requirements as outlined in the permit application submitted as required by OAC rules 3745-109-03, 109-10 and 109-16 for the affected emissions units.

The permittee shall also comply with any subsequent federally mandated programs that may replace the CAIR program affecting these emissions units [see note in paragraph 4.a) below].

(Authority for term: OAC rules 3745-77-07(A)(5) and 3745-109)

4. Clean Air Interstate Rule – OAC Chapter 3745-109

a) ORIS Facility Code – 880042:

- (1) Emissions Unit P009 – No. 3 Slab Reheat Furnace/Waste Heat Boiler
 Emissions Unit P010 – No. 2 Slab Reheat Furnace/Waste Heat Boiler
 Emissions Unit P011 – No. 1 Slab Reheat Furnace/Waste Heat Boiler
 Emissions Unit P012 – No. 4 Slab Reheat Furnace/Waste Heat Boiler

Note: Ohio EPA DAPC completed rule amendments for OAC Chapter 3745-14, specifically, OAC rule 3745-14-01 and OAC rule 3745-14-06, which facilitated the transition of the affected units from OAC Chapter 3745-14 into the federal Clean Air Interstate Rule (CAIR) program which began with the 2009 control periods. This began the process of “sunsetting” the parts of OAC Chapter 3745-14 that were no longer needed as a result of Ohio’s CAIR rules (OAC Chapter 3745-109). On July 6, 2010, US EPA announced the proposed CAIR replacement rule, the “Transport Rule,” as required by the original court vacatur of the federal CAIR program in July 2008. On August 21, 2012, the United States Court of Appeals for the D.C. Circuit vacated the Transport Rule and ordered EPA to continue administering CAIR until it promulgates a replacement.

(Authority for term: OAC rules 3745-77-07(A)(5) and 3745-109)

5. The Southwest Ohio Air Quality Agency has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for Emissions Unit P901 Baghouse P901BH01; Emissions Unit P024, Baghouse P024BH01; and Emissions Unit P925, Bischoff Scrubber



P925SC01. The permittee shall comply with the provisions of the plan (as specified in Part C - Terms and Conditions for Emissions Units) for the aforementioned emissions units.

(Authority for term: 40 CFR Part 64)

6. Federal rule applicability:

The following emissions unit contained in this permit is subject to 40 CFR Part 63, Subparts A and L, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Oven Batteries: B918.

The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and CCCCC, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Ovens: Pushing, Quenching, and Battery Stacks: B918, F021, and P043.

The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and FFFFF, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel Manufacturing Facilities: F011, F025, P047, P925, P926, P927, P934, and P956.

The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and DDDDD, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources – Commercial, Industrial, and Institutional Boilers and Process Heaters: B021, B022, B023, B026, P019, and P022.

The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and CCC, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants: P023 and P024.

The following emissions units contained in this permit are subject to 40 CFR Part 61, Subparts A and L, National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants: P068, P070, P075, P096, and T021.

The following emissions units contained in this permit are subject to 40 CFR Part 61, Subparts A and V, National Emission Standard for Equipment Leaks (Fugitive Emissions Sources): P068, P070, P075, P096, and T021.

The following emissions units contained in this permit are subject to 40 CFR Part 61, Subparts A and FF, National Emission Standards for Benzene Waste Operations: P070, P075, P096, and T021.

The following insignificant emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines: P098, P099, P100, P101, P102, P103, P104, P105, P106, P107, P108, P109, P110, P111, P119, P120, P121, P122, P123, P124, P125, P126, and P127.

The complete NESHAP requirements, including the NESHAP 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 Southwest Ohio Air Quality Agency.

(Authority for term: 40 CFR Part 63 and 40 CFR Part 61)



7. The following abbreviations are used throughout this permit:

NO_x = Nitrogen Oxides

CO = Carbon Monoxide

VOC = Volatile Organic Compounds

PE = Particulate matter measurable by the applicable test methods in 40 CFR Part 60, Appendix A, "Standards of Performance for New Stationary Sources"

PM₁₀ = Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix J and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

SO₂ = Sulfur dioxide

H₂S = Hydrogen sulfide

HAP = Hazardous Air Pollutant

TPY = Tons per year

MMBtu = million British thermal units

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code

ORC = Ohio Revised Code



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. B918, No.2 Coke Plant

Operations, Property and/or Equipment Description:

Wilputte Underjet 76-oven Coke Battery

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
<i>Coke oven doors</i>		
a.	40 CFR Part 63, Subpart L [63.302(a)(3)(ii)] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Oven Batteries	There shall not be more than 3.3 percent leaking coke oven doors for this by-product coke oven battery, based on a 30-run rolling average. See c)(1).
b.	OAC rule 3745-17-07(B)(2)(d)(ii)	At no time shall there be visible fugitive particulate emissions from more than ten percent of the oven doors. Two oven doors, which represent the last oven charged prior to the commencement of visible particulate emission readings performed in accordance with paragraph (B)(2)(c) of OAC rule 3745-17-03, shall be exempted from this visible emission limitation. See b)(2)b.
<i>Topside port lids/charging hole lids</i>		
c.	40 CFR Part 63, Subpart L [63.302(a)(3)(iii)] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Oven Batteries	There shall not be more than 0.4 percent leaking topside port lids for this by-product coke oven battery, based on a 30-run rolling average. See c)(1).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(B)(2)(c)	At no time shall there be visible fugitive particulate emissions from more than five percent of the charging-hole lids.
Offtake systems/piping		
e.	40 CFR Part 63, Subpart L [63.302(a)(3)(iv)] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Oven Batteries	There shall not be more than 2.5 percent leaking offtake systems, based on a 30-run rolling average. See c)(1).
f.	OAC rule 3745-17-07(B)(2)(b)	At no time shall there be visible fugitive particulate emissions from more than ten percent of the offtake piping.
Charging		
g.	40 CFR Part 63, Subpart L [63.302(a)(3)(v)] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Oven Batteries	There shall not be more than 12 seconds of visible emissions per charge, based on a 30-day rolling log average. See c)(1).
h.	OAC rule 3745-17-07(B)(2)(a)	There shall be no visible fugitive particulate emissions from any charging operations except for a period of time not to exceed one hundred twenty-five seconds during any five consecutive charges. One charge, which represents the charge with the highest visible particulate emissions value of twenty consecutive charges observed, may be exempted from this visible particulate emission limitation.
Bypass/Bleeder stacks		
i.	40 CFR Part 63, Subpart L [63.307(c)] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Oven Batteries	The emergency bypass/bleeder flare shall be operated with no visible emissions, as determined by the methods specified in 63.309(h)(1), except for periods not to exceed 5 minutes during any 2 consecutive hours. See b)(2)a. and c)(1).

Collecting mains		
j.	40 CFR Part 63, Subpart L [63.308(a)-(d)] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Oven Batteries	See c)(1).
Combustion/battery stack		
k.	40 CFR Part 63, Subpart CCCCC [63.7296(a)] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Ovens: Pushing, Quenching, and Battery Stacks	For a battery on a normal coking cycle, the opacity from the battery stack shall not exceed 15 percent opacity, or 20 percent opacity when on extended coking, based upon a daily average. See c)(1).
l.	OAC rule 3745-17-07(C)	See b)(2)c.
m.	OAC rule 3745-17-07(A)(1)	Exempt per OAC rule 3745-17-07(A)(3)(i). See b)(2)c.
n.	OAC rule 3745-17-10(C)(1) Figure 1	Particulate emissions from coke oven firing (combustion stack) shall not exceed 0.18 pound per MMBtu of actual heat input.
o.	OAC rule 3745-18-15(C)(3)(a)	The hydrogen sulfide content of the coke oven gas combusted in this emissions unit shall not exceed 280 grains per 100 dry standard cubic feet of coke oven gas burned based on a thirty-day average.
p.	40 CFR Part 63, Subpart CCCCC [63.7350] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Ovens: Pushing, Quenching, and Battery Stacks	Table 1 to Subpart CCCCC of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart CCCCC shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
Pushing		
q.	40 CFR Part 63, Subpart CCCCC [63.7290(a)(2)] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Ovens: Pushing, Quenching, and Battery Stacks	Emissions of particulate matter from the control device for pushing emissions shall not exceed 0.02 pound per ton of coke. See c)(1).
r.	OAC rule 3745-17-07(B)(2)(e)	Visible fugitive particulate emissions during any pushing operations shall not exceed an average of 20 percent opacity



Effective Date: To be entered upon final issuance

		<p>read above the battery top.</p> <p>The duration of a pushing operation shall commence with the moving (or pushing) of the coke mass from an oven and shall conclude when the quench car enters the quench tower.</p>
s.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
t.	40 CFR Part 63, Subpart CCCCC [63.7350] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Ovens: Pushing, Quenching, and Battery Stacks	Table 1 to Subpart CCCCC of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart CCCCC shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
Other Coke Plant Fugitive Emissions		
u.	OAC rule 3745-17-08(B)	<p>The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). The requirements of this rule are met by compliance with OAC rule 3745-17-07(B), 40 CFR Part 63, Subpart L, and 40 CFR Part 63, Subpart CCCCC.</p> <p>In accordance with OAC rule 3745-17-08(B)(3)(b), particulate emissions from any baghouse exhaust shall not exceed 0.030 grain/dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s) whichever is less stringent. The emission limitation specified by this rule may be less stringent than the emission limitations established pursuant to 40 CFR Part 63, Subpart L and/or Subpart CCCCC. The permittee shall comply with all applicable emission limitations (including any less stringent emission limitation) for this emissions unit.</p>

(2) Additional Terms and Conditions

- a. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63 , Subpart L, including the following sections:



63.307(a)(1) and (2)	Flare system requirements
63.307(b)	Flare design requirements

- b. Pursuant to OAC rule 3745-17-07(B)(2)(d)(iii), an oven door and the associated chuck door on the pusher side of the battery shall be considered as one door.
- c. Pursuant to the provisions of OAC rule 3745-17-07(C), the permittee is hereby granted the following equivalent visible particulate emissions limitation for this emissions unit, in lieu of the 20 percent opacity limitation specified in OAC rule 3745-17-07(A)(1)(a):

Except as otherwise provided in OAC rule 3745-17-07(A)(1)(b) through (A)(3), the permittee shall not cause or allow the discharge into the ambient air, from the combustion stack associated with this emissions unit, visible particulate emissions greater than 45 percent opacity, as a 6-minute average.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart L, and 40 CFR Part 63, Subpart CCCCC, including the following sections:

63.306(a)	Written work practice plan.
63.306(b)	Written work practice plan components
63.306(c)	Implementation of work practice plan.
63.306(d)	Revisions to work practice plan.
63.308(c)-(d)	Collecting main leak detection repair requirements.
63.310(a)	General duty to minimize emissions.
63.310(b), 63.310(g)-(i)	Startup, shutdown, and malfunction plan.
63.310(c)	Correction of malfunctions.
63.7290(b)(3)	Capture system requirements for pushing.
63.7291(a)	Work practice standards for fugitive pushing emissions.
63.7294(a)	Work practice plan for soaking.
63.7300(a)	General duty to minimize emissions.

63.7300(b)	Operation and maintenance plan for existing by-product coke-oven batteries.
63.7300(c)	Operation and maintenance plan for each capture system and control device for pushing emissions.
63.7310(c)	Startup, shutdown, and malfunction plan.
63.7323(c) and (e)	Site-specific operating limit procedures for pushing capture system(s).

[Authority for Term: OAC rule 3745-77-07(A)(1), 40 CFR Part 63, Subpart L, and 40 CFR Part 63, Subpart CCCCC]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect daily grab samples of the coke oven gas burned in this emissions unit as specified in term d)(3) for emissions unit P067. The following information shall be collected and recorded on a daily basis:

- a. The sulfur content of the samples taken, recorded in percent by weight, of the coke oven gas [the grains of hydrogen sulfide (H₂S) per 100 dry standard cubic feet of coke oven gas shall be converted to a decimal fraction of sulfur by multiplying the grains of H₂S per 100 cubic feet times 1 pound H₂S per 7000 grains of H₂S times 0.94 pound of sulfur per 1 pound of H₂S, dividing by 100 (dscft/hdscft) and dividing by the density of coke oven gas (0.027 pound per cubic foot)];
- b. The rolling thirty-day average hydrogen sulfide content of the coke oven gas in grains per 100 dry standard cubic feet of coke oven gas burned.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04, and OAC rule 3745-18-15(C)(3)(a)]

(2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart L, and 40 CFR Part 63, Subpart CCCCC, including the following sections:

63.308(a) and (b)	Collecting main inspection and recordkeeping requirements.
63.309(e)	Availability of daily inspection results
63.310(f)	Malfunction records.
63.311(f)	Listing of records to be maintained.
63.311(g)	Availability of records.
63.7330(a),	Baghouse monitoring and bag leak detection system

63.7331(a)	requirements.
63.7330(d), 63.7331(g)-(i)	Capture system monitoring requirements for pushing.
63.7330(e), 63.7331(j)(1)-(4)	Continuous opacity monitoring system (COMS) requirements for by-product coke oven battery stacks.
63.7331(j)(5)	Hourly and daily opacity record keeping requirements by-product coke oven battery stacks.
63.7331(b)-(d)	Site-specific monitoring plan and continuous parametric monitoring system (CPMS) requirements.
63.7332(a)-(b)	Continuous monitoring and data collection requirements.
63.7333(a)	Continuous compliance demonstration requirements for pushing emissions.
63.7333(d)	Continuous compliance demonstration requirements for each capture system for pushing emissions.
63.7333(e)	Continuous compliance demonstration requirements for battery stack opacity limit.
63.7334(a)	Continuous compliance demonstration requirements for work practice standards (vertical flues - fugitive pushing emissions observations)
63.7334(d)	Continuous compliance demonstration requirements for work practice standards (soaking)
63.7335(a)-(d)	Continuous compliance demonstration requirements for operation and maintenance requirements
63.7342(a)-(d)	Required overall records to be maintained.
63.7343(a)-(c)	Format and retention of records.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart L, and 40 CFR Part 63, Subpart CCCCC]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the coke oven gas hydrogen sulfide content limitation specified in b)(1)o. of these terms and conditions.

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 OAC rule 3745-18-15(C)(3)(a)]

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart L, and 40 CFR Part 63, Subpart CCCCC, including the following sections:

63.310(d)-(e)	Notifications of startup, shutdown, and malfunction.
63.311(a)-(c)	Submittal of notifications and reports.
63.311(d)	Semiannual compliance certification.
63.311(e)	Report for the venting of coke oven gas other than through a flare system.
63.7336(a)	Deviation reporting.
63.7340(a)	Overall notification reporting requirements.
63.7340(d)	Notification of intent to test.
63.7340(e)	Notification of compliance status.
63.7341(a)	Compliance report due dates.
63.7341(b)	Quarterly compliance report contents.
63.7341(c)	Semiannual compliance report contents.
63.7341(d)	Immediate startup, shutdown, and malfunction reports.
63.7341(e)	Title V monitoring report allowance.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart L, and 40 CFR Part 63, Subpart CCCCC]

f) Testing Requirements

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

a. Emission Limitation:

There shall not be more than 3.3 percent leaking coke oven doors for this by-product coke oven battery, based upon the 30-run rolling average.



Applicable Compliance Method:

Compliance shall be determined through visible emissions observations as outlined in 40 CFR 63.309(d)(1) using Method 303 or 303A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart L]

b. Emission Limitation:

There shall be no visible fugitive particulate emissions from more than ten percent of the oven doors.

Applicable Compliance Method:

Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(2)(c). Two oven doors, which represent the last oven charged prior to the commencement of visible particulate readings shall be exempted from this visible emission limitation.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(2), and OAC rule 3745-17-03(B)(2)(c)]

c. Emission Limitation:

There shall not be more than 0.4 percent leaking topside port lids for this by-product coke oven battery, based upon the 30-run rolling average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations as outlined in 40 CFR 63.309(d)(1) using Method 303 or 303A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart L]

d. Emission Limitation:

At no time shall there be visible fugitive particulate emissions from more than five percent of the charging-hole lids.

Applicable Compliance Method:

Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(2)(b).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(2), and OAC rule 3745-17-03(B)(2)(b)]

e. Emission Limitation:

There shall not be more than 2.5 percent leaking offtake systems, based upon the 30-run rolling average.



Applicable Compliance Method:

Compliance shall be determined through visible emissions observations as outlined in 40 CFR 63.309(d) using Method 303 or 303A.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart L]

f. Emission Limitation:

At no time shall there be visible fugitive particulate emissions from more than ten percent of the offtake piping.

Applicable Compliance Method:

Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(2)(b).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(2), and OAC rule 3745-17-03(B)(2)(b)]

g. Emission Limitation:

There shall not be more than 12 seconds of visible emissions per charge, as a logarithmic 30-day rolling average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations as outlined in 40 CFR 63.309(d)(2) using Method 303.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart L]

h. Emission Limitation:

There shall be no visible fugitive particulate emissions from any charging operations except for a period of time not to exceed one hundred twenty-five seconds during any five consecutive charges.

Applicable Compliance Method:

Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(2)(a). One charge, which represents the charge with the highest visible particulate emissions value of twenty consecutive charges observed, may be exempted from this visible particulate emission limitation.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(2), and OAC rule 3745-17-03(B)(2)(a)]



i. Emission Limitation:

The emergency bypass/bleeder flare shall be operated with no visible emissions, as determined by the methods specified in 63.309(h)(1), except for periods not to exceed 5 minutes during any 2 consecutive hours.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations as outlined in 40 CFR 63.309(h)(1) using Method 22.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart L]

j. Emission Limitation:

The opacity from the battery stack shall not exceed 15 percent opacity, or 20 percent when on extended coking, based upon a daily average.

Applicable Compliance Method:

Compliance shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit using the continuous opacity monitoring system and the procedures outlined in 40 CFR 63.7324(b), 63.7333(e), and 63.7331(j).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCCCC]

k. Emission Limitation:

Visible particulate emissions from the combustion stack shall not exceed 45 percent opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(C), and OAC rule 3745-17-03(B)(1)]

l. Emission Limitation:

Particulate emissions from coke oven firing (combustion stack) shall not exceed 0.18 pound per MMBtu of actual heat input.

Applicable Compliance Method:

The emission limitation above is based upon a maximum rated heat input of 136 MMBtu/hour and the applicable emission rate equation found in OAC rule 3745-



17-10, Figure 1. The actual particulate emission rate shall be calculated from the results of the most recent stack test which demonstrated compliance. The permittee shall conduct emission testing in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A and the requirements of OAC rule 3745-17-03(B)(9). See f)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-10(C), and OAC rule 3745-17-03(B)(9)]

m. Emission Limitation:

Emissions of particulate matter from the control device for pushing emissions shall not exceed 0.02 pound per ton of coke.

Applicable Compliance Method:

The actual particulate emission rate shall be calculated from the results of the most recent stack test which demonstrated compliance. The permittee shall conduct emission testing in accordance with the requirements of 40 CFR Part 63, Subpart CCCCC. See f)(3) and f)(4).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCCCC]

n. Emission Limitation:

Visible fugitive particulate emissions during any pushing operations shall not exceed an average of 20 percent opacity read above the battery top.

Applicable Compliance Method:

The duration of a pushing operation shall commence with the moving (or pushing) of the coke mass from an oven and shall conclude when the quench car enters the quench tower. For pushing operations, visible particulate emissions shall be determined according to 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(2)(d).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(2), and OAC rule 3745-17-03(B)(2)(d)]

o. Emission Limitation:

Visible particulate emissions from any stack (pushing operations) shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

p. Emission Limitation:

The hydrogen sulfide content of the coke oven gas combusted in this emissions unit shall not exceed 280 grains per 100 dry standard cubic feet of coke oven gas burned based on a thirty-day average.

Applicable Compliance Method:

Compliance may be demonstrated by the monitoring and record keeping requirements specified in d)(1). If testing is required, the hydrogen sulfide content of coke oven gas samples shall be determined using the "Tutwiler Method."

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04, and OAC rule 3745-18-15(C)(3)(a)]

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

- a. The emission testing shall be conducted within 12 months of the effective date of this permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for particulates from coke oven firing (combustion stack).
- c. The following test method(s) and procedures shall be employed to demonstrate compliance with the allowable mass emission rate:

40 CFR Part 60, Appendix A, Methods 1 through 5, and OAC rule 3745-17-03(B)(9)

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
 - f. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.
- (3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted between 24-36 months of the effective date of this permit and within 6 months of permit expiration.
 - b. The emission testing shall be conducted at the outlet of B918BH01 (control device for pushing emissions) to demonstrate compliance with the allowable mass emission limitation for particulates.
 - c. The test method(s) and procedures outlined in 40 CFR 63.7322 shall be employed to demonstrate compliance with the allowable mass emission rate.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.
 - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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



Effective Date: To be entered upon final issuance

deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an “Intent to Test” notification to the Southwest Ohio Air Quality Agency. The “Intent to Test” notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
- f. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCCCC]

- (4) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart L, and 40 CFR Part 63, Subpart CCCCC, including the following sections:

63.309(a)	Daily performance test conducted each day, 7 days per week and required procedures.
63.309(c)	Performance test requirements.
63.309(e)	Availability of performance test results.
63.309(f)	Additional emission observations.
63.309(h)	Flare requirements.
63.309(i)	Use of training or certification results.
63.310(i)	Observations during start-up, shutdown or malfunction events.
63.7310(a)	General compliance requirements.



Effective Date: To be entered upon final issuance

63.7320(a)-(b)	Initial performance tests and compliance requirements
63.7321	Subsequent performance test requirements [see f)(1)m. above]
63.7322(a)-(b)	Performance test requirements and test methods
63.7324(a)-(b)	Initial compliance with coke oven battery opacity limits
63.7326(a)-(d)	Initial compliance demonstrations with emission limitations
63.7327(a), (d), and (f)	Initial compliance demonstrations with work practice standards
63.7328(a)-(d)	Initial compliance demonstrations with operation and maintenance requirements

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 63, Subpart L, and 40 CFR Part 63, Subpart CCCCC]

g) **Miscellaneous Requirements**

- (1) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart L, including the following sections:

63.312	Existing regulations and requirements.
63.313	Implementation and enforcement.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart L]

2. F001, Roads & Parking Areas

Operations, Property and/or Equipment Description:

Paved and unpaved roadways and parking areas

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)(4)	There shall be no visible particulate emissions of fugitive dust from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.
b.	OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions of fugitive dust from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a. through b)(2)g.

(2) Additional Terms and Conditions

a. 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. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by sweeping or flushing of surface material at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. 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 water or a suitable dust suppressant at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. 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 water or a suitable dust suppressant 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 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.
- e. 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.
- f. 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.
- g. 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.
- h. This emissions unit consists of all the paved and unpaved roadways and parking areas on the facility property east of Yankee Road and north of Oxford State Road and all paved areas south of Oxford State Road.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. paved roadways and parking areas

minimum inspection frequency: daily

b. unpaved shoulders

minimum inspection frequency: once every 2 weeks

c. unpaved roadways and parking areas

minimum inspection frequency: daily

If the daily checks for the paved and unpaved roadways show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(4), OAC rule 3745-17-07(B)(5), and OAC rule 3745-17-08(B)]

- (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 practicable.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(4), OAC rule 3745-17-07(B)(5), and OAC rule 3745-17-08(B)]

- (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.

The information required under item (d) above shall be kept separately for the paved roadways and parking areas, unpaved shoulders, and 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), OAC rule 3745-17-07(B)(4), OAC rule 3745-17-07(B)(5), and OAC rule 3745-17-08(B)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports that identify all 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.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(B)(4), OAC rule 3745-17-07(B)(5), and OAC rule 3745-17-08(B)]

f) Testing Requirements

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

There shall be no visible particulate emissions of fugitive dust from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 22, and the procedures specified in OAC rule 3745-17-03(B)(4).



No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(4), OAC rule 3745-17-03(B)(4)]

b. Emission Limitation:

There shall be no visible particulate emissions of fugitive dust from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 22, and the procedures specified in OAC rule 3745-17-03(B)(4).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(5), OAC rule 3745-17-03(B)(4)]

g) Miscellaneous Requirements

- (1) None.



3. F002, RM Storage Piles

Operations, Property and/or Equipment Description:

Load-in and load-out of storage piles and wind erosion from storage piles

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 3745-17-07(B)(6)	There shall be no visible particulate emissions from any material storage pile except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a. through b)(2)e.

(2) Additional Terms and Conditions

a. The storage piles subject to OAC rule 3745-17-07(B)(6) and OAC rule 3745-17-08(B) are listed below:

Coal Storage Pile(s), Iron Bearing Materials Storage Pile(s), Coke Storage Pile(s), Slag Storage Pile(s), Fluxing Agents Storage Pile(s).

b. The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with the storage piles 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 the following control measures for the load-in and load-out operations: water spray, drop height reduction, bucket reclaimers and dust suppressants at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.



- c. The above-mentioned control measures shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.
- d. The permittee shall employ reasonably available control measures for wind erosion from the surfaces of all storage piles 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 each storage pile with water and/or any other suitable dust suppression 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 above-mentioned control measures shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measures shall not be necessary for a storage pile 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.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the load-in and load-out operations at each storage pile in accordance with the following frequencies:

storage pile identification:

Coal Storage Pile(s), Iron Bearing Materials Storage Pile(s), Coke Storage Pile(s), Slag Storage Pile(s), Fluxing Agents Storage Pile(s)

minimum inspection frequency:

daily

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B)]

- (2) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification:

Coal Storage Pile(s), Iron Bearing Materials Storage Pile(s), Coke Storage Pile(s), Slag Storage Pile(s), Fluxing Agents Storage Pile(s)

minimum wind erosion inspection frequency:

daily

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B)]

- (3) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity 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 practicable.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B)]

- (4) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B)]

- (5) The permittee shall maintain records of the following information:

- a. the date and reason any required inspection was not performed, and the date any inspection was 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, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required under item (d) above shall be kept separately for the load-in operations, the load-out operations, and the pile surfaces (wind erosion), 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), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports that identify all 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.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B)]

f) Testing Requirements

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

There shall be no visible particulate emissions from any material storage pile except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 22, and the procedures specified in OAC rule 3745-17-03(B)(4).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-03(B)(4)]



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

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g) Miscellaneous Requirements

- (1) None.



4. F011, BOF Deslagger

Operations, Property and/or Equipment Description:

Molten iron deslagging operation

- 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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)b. and b)(2)d. The grain of particulate emissions per dry standard cubic foot limitation required by this rule is less stringent than the limitation established pursuant to 40 CFR Part 63, Subpart FFFFF.
d.	OAC rule 3745-17-11(B)	Total particulate emissions from all stacks associated with this emissions unit, combined, shall not exceed 20.4 pounds per hour. See b)(2)a.
e.	40 CFR Part 63, Subpart FFFFF (40 CFR Part 63.7780-7852) National Emission Standards for Hazardous Air Pollutants (NESHAP)	See b)(2)c. and c)(1).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	for Integrated Iron and Steel Manufacturing Facilities [In accordance with 40 CFR 63.7782 (c), this emissions unit is a shop ancillary operation of an existing basic oxygen process furnace (BOPF) shop located at an integrated steel manufacturing facility subject to the emissions limitations and control measures specified in this section.]	
f.	40 CFR Part 63, Subpart A (40 CFR 63.7850)	Table 4 to Subpart FFFFF of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart FFFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
g.	OAC rule 3745-31-05(A)(3) (PTI 18-007, issued June 6, 1974)	See b)(2)e.

(2) Additional Terms and Conditions

- a. The particulate emissions limitation of 20.4 pounds per hour is based upon an uncontrolled emission rate of 250 pounds PE per hour and Figure II of OAC rule 3745-17-11. This limit is more stringent than that determined using the maximum process weight of 1000 tons per hour and Table I of OAC rule 3745-17-11.
- b. The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture and vent the particulate emissions from the molten iron deslagging operation to baghouse P926/7BH01. The control equipment shall meet the following requirement:
 - i. the collection efficiency of the hooding and ventilation equipment associated with the molten iron deslagging operation 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.
- c. Pursuant to Table 1 of Subpart FFFFF of 40 CFR Part 63, the baghouse shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Particulate emissions from this emissions unit are vented to the same baghouse as the baghouse (P926/7BH01) controlling secondary particulate emissions from emissions units P926 and P927. A small baghouse controlling particulate emissions from this emissions unit was removed when baghouse P926/7BH01 was installed to control secondary particulate emissions from all emissions units



within the Basic Oxygen Furnace House for compliance with 40 CFR Part 63, Subpart FFFFF.

- d. The permittee shall minimize or eliminate visible emissions of fugitive dust through the employment of RACM. The deslagging area shall be thoroughly cleaned on a monthly basis to remove the excessive accumulation of kish. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. No applicable emission limitations or control measures were established for this emissions unit in PTI 18-007.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7800(a)	General duty to minimize emissions.
63.7810(c)	Startup, shutdown, and malfunction plan.

Note: the capture and control device for particulate emissions from this ancillary emissions unit is baghouse P926/7BH01 which controls most particulate emissions from the Basic Oxygen Furnace House.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart FFFFF]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7830(b)	Baghouse monitoring and inspection requirements
63.7831(a)-(d)	Site-specific monitoring plan and continuous parameter monitoring system (CPMS) requirements
63.7831(f)	Bag leak detection system requirements (for shared baghouse P926/7BH01)
63.7832(a)-(b)	Continuous monitoring and data collection requirements
63.7833(a), Table 3 of Subpart FFFFF	Continuous compliance demonstration requirements for emission limits
63.7833(c)	Continuous compliance demonstration requirements for each baghouse
63.7842(a)-(d)	Required overall records to be maintained



63.7843(a)-(c)	Format and retention of records
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Note: the capture and control device for particulate emissions from this ancillary emissions unit is baghouse P926/7BH01 which controls most particulate emissions from the Basic Oxygen Furnace House.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #18-007, issued on June 6, 1974:d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7835(a)	Deviation reporting
63.7840(a)	Overall notification reporting requirements
63.7840(d)	Notification of intent to test
63.7840(e)	Notification of compliance status
63.7841(a)	Compliance report due dates
63.7841(b)	Compliance report contents
63.7841(c)	Immediate startup, shutdown, and malfunction reports
63.7841(d)	Title V monitoring report allowance

Note: the capture and control device for particulate emissions from this ancillary emissions unit is baghouse P926/7BH01 which controls most particulate emissions from the Basic Oxygen Furnace House.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (2) 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 #18-007, issued on June 6, 1974:e)(1). 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 compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

b. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The points of observation for visible emission observations shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to: doorways, windows, and roof monitors.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

c. Emission Limitation:

Total particulate emissions from all stacks associated with this emissions unit, combined, shall not exceed 20.4 pounds per hour.



Applicable Compliance Method:

If required, compliance shall be determined through use of MACT limit of 0.01 grain/dscf multiplied by 40,000 acfm (the volumetric design flowrate to the SEC baghouse specific to skimmer operation) multiplied by 60 minutes/hour and divided by 7000 grains/pound.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(B), and OAC rule 3745-17-03(B)(10)]

d. Emission Limitation:

The baghouse shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

The actual emission rate shall be calculated from the results of the most recent stack test which demonstrated compliance*. The permittee shall conduct emission testing in accordance with the requirements of 40 CFR Part 63, Subpart FFFFF. See f)(2).

*NOTE: baghouse P926/7BH01 controls secondary particulate emissions from the Basic Oxygen Furnace House ancillary operations including this emissions unit. See the terms for emissions units P926 and P927 for the performance test requirement. Pursuant to Subpart FFFFF, the permittee must conduct performance tests no less frequently than once during the term of this Title V permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (2) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7810(a)	General compliance requirements
63.7820(a)	Initial performance tests and compliance requirements
63.7821(a) and (c)	Subsequent performance tests [see f)(1)d. above]
63.7822(a), (b), and (h)	Performance test requirements and test methods
63.7825(a) and (c)	Initial compliance demonstrations with emission limitations
63.7835(b)	Startups, shutdowns, and malfunctions

Note: the capture and control device for particulate emissions from this ancillary emissions unit is baghouse P926/7BH01 which controls most particulate emissions from the Basic Oxygen Furnace House.



[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #18-007, issued on June 6, 1974:f)(1) and f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
- g) Miscellaneous Requirements
- (1) None.

5. F012, BF Raw Materials Handling

Operations, Property and/or Equipment Description:

Raw material (coke, iron bearing materials, and fluxing agents) handling equipment for No. 3 Blast Furnace Stockhouse

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 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust. See b)(2)b.

(2) Additional Terms and Conditions

a. The blast furnace raw material handling operations that are covered by this permit and subject to OAC rule 3745-17-07(B)(1) and OAC rule 3745-17-08(B) are listed below:

Railcar unloading, stockhouse storage bins, stockhouse conveyors, stockhouse transfer points, skip cars, and raw material handling.

b. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) in b)(2)a. 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 perform the following control measure(s) to ensure compliance:

i. The permittee shall employ good operating practices during railcar unloading including, but not limited to controlling the release rate of



Effective Date: To be entered upon final issuance

material and the use of a windbreak to minimize or eliminate visible particulate emissions of fugitive dust.

- ii. The permittee shall maintain enclosures for the storage bins, conveyors, and transfer points* to minimize or eliminate visible particulate emissions of fugitive dust.

*All stockhouse conveyor transfer points are enclosed except the transfer point at the top of the stockhouse (ends of the conveyor).

- iii. The permittee shall maintain the integrity of the skip cars to minimize or eliminate visible particulate emissions of fugitive dust.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each material processing and handling operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material Handling Operation(s)</u>	<u>Minimum Inspection Frequency</u>
All Operations	Once During Each Day of Operation

The inspections shall be performed during representative, normal operating conditions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (2) The permittee shall maintain records of the following information for the material processing and handling operations:
 - a. the date and reason any required inspection was not performed;
 - 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.

The information under item (d) above shall be kept separately for each material handling operation identified above, 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), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

e) Reporting Requirements

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

- a. each day during which an inspection of the material processing and handling operations was not performed by the required frequency; and
- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The visible emission observations shall be performed at the appropriate non-stack egress points from this emissions unit.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) None.

6. F015, Slab Scarfing/Slitting

Operations, Property and/or Equipment Description:

Manual slab scarfing and slitting

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 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible particulate emissions of fugitive dust See b)(2)a.

(2) Additional Terms and Conditions

a. The permittee shall employ good engineering practices to minimize or eliminate the visible particulate emissions of fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the fugitive egress points for this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports that identify:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]



f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The visible emission observations shall be performed at the appropriate non-stack egress points from this emissions unit.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

g) Miscellaneous Requirements

(1) None.



7. F021, Backup Quench Station

Operations, Property and/or Equipment Description:

112 TPH Backup Coke Quench Station

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 14-05031, issued January 24, 2002)	<p>PE shall not exceed 180.8 pounds per hour*.</p> <p>PM₁₀ emissions shall not exceed 54.4 pounds per hour*.</p> <p>*The hourly emission limitations are based upon the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.</p> <p>The permittee shall employ clean quench water with a total dissolved solids (TDS) concentration equal to or less than 1500 milligrams per liter (mg/L) during the coke quenching operation. This TDS limitation established under OAC rule 3745-31-05(A)(3) is less stringent than the emission limitation established pursuant to 40 CFR 63, Subpart CCCCC. The permittee shall comply with all applicable emission limitations (including any less stringent limitation) for this emissions unit.</p> <p>See b)(2)a. and c)(2).</p> <p>The requirements of this rule also include compliance with the requirements of OAC</p>



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule 3745-17-07(B)(1), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D)	<p>PE shall not exceed 24.69 tons per year based on a rolling 12-month summation.</p> <p>PM₁₀ emissions shall not exceed 7.43 tons per year based on a rolling 12-month summation.</p> <p>See c)(1).</p>
c.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
e.	<p>40 CFR Part 63, Subpart CCCCC [40 CFR 63.7280 – 63.7352]</p> <p>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Ovens: Pushing, Quenching, and Battery Stacks</p> <p>[In accordance with 40 CFR 63.7282 and 63.7352, this emissions unit is a backup quench station at an existing coke oven battery subject to the requirements specified in this section.]</p>	<p>The concentration of total dissolved solids (TDS) in the water used for quenching must not exceed 1,100 milligrams per liter (mg/L) in quenching water.</p> <p>See c)(3).</p>
f.	40 CFR Part 63, Subpart A [40 CFR 63.7350]	Table 1 to subpart CCCCC of CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart CCCCC shows which parts of the General Provisions in 40 CFR 63.1- 63.15 apply.

(2) Additional Terms and Conditions

- a. The permittee shall restrict the operation of this emissions unit to only those times when the Wilputte Quench Tower (emissions unit P043) is out of service due to repairs, maintenance, or malfunctions.

c) Operational Restrictions

- (1) The maximum number of pushes from the No. 2 Coke Plant (emissions unit B918) that are quenched in this emissions unit shall not exceed 2511 pushes per year, based upon a rolling, 12-month summation.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D)]

- (2) The permittee shall not employ direct by-product contact water in the quenching operation.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]

- (3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart CCCCC, including the following sections:

63.7295(a)(2)	Use acceptable makeup water
63.7295(c)	Requests for alternative work practice standards
63.7300(a)	General duty to minimize emissions
63.7310(c)	Startup, shutdown, and malfunction plan

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63, Subpart CCCCC]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
- a. the number of pushes from the No. 2 Coke Plant (Emissions unit B918) that are quenched in this emissions unit;
 - b. the rolling, 12-month summation of the number of pushes from the No. 2 Coke Plant that are quenched in this emissions unit; and
 - c. the rolling, 12-month summation of the PE and PM₁₀ emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D)]

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the fugitive egress points for this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (3) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart CCCCC, including the following sections:

63.7333(f)	Continuous compliance demonstration requirements for TDS limit for quenching
63.7334(e)	Continuous compliance demonstration requirements for work practice standards
63.7342(a) and (d)	Required overall records to be maintained
63.7343(a)-(c)	Format and retention of records

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCCCC]

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and



record keeping requirements contained in Permit to Install #14-05031, issued on January 24, 2002:d)(1) - d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any exceedances of the rolling, 12-month limitation on the number of pushes specified in c)(1); and
 - b. any exceedances of the rolling, 12-month limitations of the PE and PM₁₀ emissions.

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), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D)]

- (2) The permittee shall submit semiannual reports that identify:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (3) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart CCCCC, including the following sections:

63.7336(a)	Deviation reporting
63.7340(a)	Overall notification reporting requirements
63.7341(a)	Compliance report due dates
63.7341(c)	Semiannual compliance report contents
63.7341(d)	Immediate startup, shutdown and malfunction reports



Table with 2 columns: 63.7341(e) and Title V monitoring report allowance

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCCCC]

(4) 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 #14-05031, issued on January 24, 2002:e)(1) - e)(3). 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 compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitations:

PE shall not exceed 180.8 pounds per hour.

PM10 emissions shall not exceed 54.4 pounds per hour.

Applicable Compliance Method:

The emission limitations above reflect the potential to emit of the emissions unit and are based upon emission factors from AP-42 Tables 12.2-12, Coke Production, May 2008, the maximum hourly coke production rate, and the maximum coal to coke yield rate supplied by the permittee in the permit application.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitations:

PE shall not exceed 24.69 tons per year based on a rolling, 12-month summation.

PM10 emissions shall not exceed 7.43 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the mass PE and PM10 emissions limits shall be demonstrated by compliance with the operational restriction in c)(1) on the number of pushes using emission factors from AP-42 Tables 12.2-12, Coke Production, May 2008, and the record keeping requirements in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D)]



c. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3). The visible emission observations shall be performed at the appropriate non-stack egress points from this emissions unit.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

d. Emission Limitations:

The concentration of total dissolved solids (TDS) in the water used for quenching must not exceed 1,100 milligrams per liter (mg/L) in quenching water. [40 CFR Part 63, Subpart CCCCC]

The permittee shall employ clean quench water with total dissolved solids (TDS) concentration equal to or less than 1500 milligrams per liter (mg/L) during the coke quenching operation. [OAC rule 3745-31-05(A)(3)]

Applicable Compliance Method:

Compliance shall be demonstrated by the water sample monitoring and record keeping requirements specified in d)(3) and the testing requirements specified in f)(2) below.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 63, Subpart CCCCC]

- (2) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart CCCCC, including the following sections:

63.7310(a)	General compliance requirements.
63.7320(b)-(c), 63.7326(c)	Initial performance tests and compliance requirements
63.7325(a)	Test methods and initial compliance with quench water limits



63.7325(b)	Alternative quench water requirements
63.7327(e) and (f)	Initial compliance demonstrations with work practice standards
63.7328(a) and (d)	Initial compliance demonstrations with operation and maintenance requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCCCC]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05031, issued on January 24, 2002:f(1) - f(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

8. F025, Backup Skimmer

Operations, Property and/or Equipment Description:

Backup Basic Oxygen Furnace Slag Skimmer.

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 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 per cent opacity as a three-minute average.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3) (PTI 14-4477, issued June 3, 1998)	PE shall not exceed 7.5 pounds per hour*. PM ₁₀ emissions shall not exceed 7.5 pounds per hour*. *The hourly emission limitations are based upon the emissions unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(D).
d.	OAC rule 3745-31-05(D)	PE shall not exceed 0.98 ton per year based on a rolling, 12-month summation. PM ₁₀ emissions shall not exceed 0.98 ton per year based on a rolling, 12-month summation. See c)(1).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63, Subpart FFFFF (40 CFR Part 63.7780-7852) National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel Manufacturing Facilities [In accordance with 40 CFR 63.7782 (c), this emissions unit is a shop ancillary operation of an existing basic oxygen process furnace (BOPF) shop located at an integrated steel manufacturing facility subject to the emissions limitations and control measures specified in this section.]	See b)(2)b. and c)(2).
f.	40 CFR Part 63, Subpart A (40 CFR 63.7850)	Table 4 to Subpart FFFFF of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart FFFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The integrity of the building housing the backup skimmer shall be maintained.
- b. Pursuant to Table 1 of Subpart FFFFF of 40 CFR Part 63, the permittee shall not cause to be discharged any secondary emissions that exhibit opacity greater than 20 percent (three-minute average).

c) Operational Restrictions

- (1) The maximum annual production rate for this emissions unit shall not exceed 260,610 tons of hot metal processed, based on a rolling, 12-month summation of the production rates.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D)]

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart FFFFF, including the following sections:



63.7800(a)	General duty to minimize emissions.
63.7810(c)	Startup, shutdown, and malfunction plan.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart FFFFF]

d) **Monitoring and/or Recordkeeping Requirements**

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

- a. the production rate for each month, in tons per month;
- b. the updated rolling, 12-month summation of the production rates; and
- c. the rolling, 12-month summation of the PE and PM₁₀ emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D)]

(2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7833(a), Table 3 of Subpart FFFFF	Continuous compliance demonstration requirements for emission limits
63.7842(a), (b) and (d)	Required overall records to be maintained
63.7843(a)-(c)	Format and retention of records

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 14-4477, issued on June 3, 1998:d(1) - d(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) **Reporting Requirements**

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

- a. any exceedances of the rolling, 12-month production limitation on the tons of hot metal processed specified in c)(1); and
- b. any exceedances of the rolling, 12-month summation of the PE and PM₁₀ emissions.



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), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D)]

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7835(a)	Deviation reporting
63.7840(a)	Overall notification reporting requirements
63.7840(d)	Notification of intent to test
63.7840(e)	Notification of compliance status
63.7841(a)	Compliance report due dates
63.7841(b)	Compliance report contents
63.7841(c)	Immediate startup, shutdown, and malfunction reports
63.7841(d)	Title V monitoring report allowance

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (3) 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 #14-4477, issued on June 3, 1998:e)(1) - 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 compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3) and 40 CFR Part 63, Subpart FFFFF.



The points of observation for visible emission observations shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to: doorways, windows, and roof monitors.

After completion of performance testing requirements specified in Subpart FFFFF, no subsequent visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-07(B), OAC rule 3745-17-03(B)(3), and 40 CFR Part 63, Subpart FFFFF]

b. Emission Limitations:

PE shall not exceed 0.98 ton per year based on a rolling, 12-month summation.

PM₁₀ emissions shall not exceed 0.98 ton per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by multiplying the updated 12-month rolling production rate by the controlled emission factor of 0.0075 lb PE/PM₁₀ per ton of hot metal, and dividing by 2000. The uncontrolled emission factor of 0.025 lb PE/PM₁₀ per ton of hot metal processed was provided by the permittee in Permit to Install application 14-4477 submitted on October 1997. A particulate control efficiency of 70% is assumed for the enclosure surrounding this emissions unit. Since the annual allowable volume of hot metal processed in this emissions unit is 260,610 tons, the following formula was used to calculate allowable emissions:

[260,610 annual tons of hot metal processed x emissions factor of 0.025 pound per ton of hot metal x (1 – control efficiency of 70%) = 1954.575 pounds per year/2000 = 0.98 TPY]. All PE is assumed to be PM₁₀.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and OAC rule 3745-31-05(A)(3)]

c. Emission Limitations:

PE shall not exceed 7.5 pounds per hour.

PM₁₀ emissions shall not exceed 7.5 pounds per hour.

Applicable Compliance Method:

The emission limitations above reflect the potential to emit of the emissions unit and are based upon multiplying the maximum hourly production rate of 1000 tons of hot metal processed by the emission factor of 0.0075 lb PE/PM₁₀ per ton of hot metal as derived above. All PE is assumed to be PM₁₀.



[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (2) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7810(a)	General compliance requirements
63.7820(a)-(b)	Initial performance tests and compliance requirements
63.7823	Performance test requirements and test methods
63.7825(a) and (c)	Initial compliance demonstrations with emission limitations
63.7835(b)	Startups, shutdowns, and malfunctions

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-4477, issued on June 3, 1998:f(1) - f(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

9. G001, Plantwide Gasoline

Operations, Property and/or Equipment Description:

Gasoline storage tanks and dispensing operations

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 3745-21-09(R)	The control efficiency of the Stage I vapor balance or vapor control system shall be at least ninety percent by weight for VOC.
b.	OAC rule 3745-21-09(DDD)	The control efficiency of the Stage II vapor control system shall be at least ninety-five percent by weight for VOC.

(2) Additional Terms and Conditions

None

c) Operational Restrictions

(1) The permittee shall comply with the following operational restrictions for the Stage I vapor control system:

a. The vapor balance and/or control system shall be kept in good working order and shall be used at all times during the transfer of gasoline.

b. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.

c. There shall be no leaks in the vapor and liquid lines during the transfer of gasoline.

d. The transfer of gasoline from a delivery vessel to a stationary storage tank shall be conducted by use of submerged fill into the storage tank. The submerged fill pipe(s) are to be installed so they are within six inches of the bottom of the storage tank.

- e. All fill caps shall be in place and clamped during normal storage conditions.
- f. The permittee shall repair any leak from the vapor balance or vapor control system within 15 days of detection, where the system is employed to meet the requirements of paragraph (R)(1) of OAC rule 3745-21-09 and when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10. Leaks of gasoline vapors from the vapor balance or control system shall be detected as described in OAC 3745-21-10(K)(5), using a liquid manometer (or equivalent device) to measure pressure during loading of gasoline and a portable hydrocarbon gas analyzer to detect any leaks. The hydrocarbon gas analyzer shall be calibrated with 2.2% propane by volume in air (or equivalent calibration gas) for 100% of the lower explosive limit according to the procedures and frequency specified by the manufacturer.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-21-09(R), and OAC rule 3745-21-10(K)]

- (2) The permittee shall operate and maintain the Stage II vapor control system in accordance with the manufacturer's specifications, the applicable CARB certification, and all requirements of paragraph (DDD)(1) of OAC rule 3745-21-09.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(DDD)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain records of the results of each leak check conducted, for the vapor balance or control system, including, at a minimum, the following information:
 - a. the date of each inspection;
 - b. the findings of each inspection, which shall indicate the location, nature, and severity of the leak (highest detected reading);
 - c. leak determination method;
 - d. the corrective action(s) taken to repair each leak and the date of final repair; and
 - e. the inspector's name and signature.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(R), 3745-21-10(K), and OAC rule 3745-15-03(A)]

- (2) The permittee shall maintain the following records:
 - a. the quantity of gasoline delivered to the facility during each calendar month;
 - b. the results of any tests performed pursuant to the testing requirements specified in this permit;



- c. a log of the date and description of all repair and maintenance work performed, including but not limited to work performed to meet manufacturer's specifications or CARB certification requirements, or any record of other modifications made to the vapor control system;
- d. a copy of the most recent operating permit application (including the emissions activity category form or appendix form) submitted to Ohio EPA;
- e. a copy of the most recent operating permit issued by the Ohio EPA, following its issuance;
- f. proof of attendance and completion of the training required by the Ohio EPA for the operator or local manager of the gasoline dispensing facility; and
- g. copies of all completed post-test inspection forms.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(DDD)]

e) Reporting Requirements

- (1) Any owner or operator who is claiming an exemption for a facility from the Stage I or Stage II vapor control requirements pursuant to paragraphs (R)(4) or (DDD)(4) of rule 3745-21-09 of the Administrative Code shall notify the appropriate Ohio EPA District Office or local air agency using the written notification procedures described in paragraph (A)(4)(a) of this rule to describe the nature of the exemption.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(R), and OAC rule 3745-21-09(DDD)]

- (2) Any leak(s) in the vapor balance system or vapor control system equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10 of the Administrative Code, that is/are not repaired within 15 days after identification shall be reported to the appropriate Ohio EPA District Office or local air agency within thirty days after the repair is completed.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(R), and OAC rule 3745-15-03(A)]

- (3) A comprehensive written report on the results of any tests performed in accordance with the requirements of this permit shall be submitted within 30 days following the completion of the tests. The test report forms contained in the Appendices to OAC rule 3745-21-10 should be submitted and contain the information necessary to determine or demonstrate compliance.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(DDD)]

f) Testing Requirements

- (1) The permittee shall demonstrate compliance for the vapor control system(s) by completing the following testing requirements:

- a. Within 60 days after the installation or modification of a vapor control system required pursuant to paragraph (DDD)(1) of that rule, the permittee shall perform the tests specified by paragraph (DDD)(2) of OAC rule 3745-21-09.
 - b. At intervals not to exceed five years, the permittee shall repeat and demonstrate compliance with the static leak test requirements contained in appendix A to OAC rule 3745-21-10 (unless a greater frequency is specified in the applicable CARB certification), and the dynamic pressure performance test requirements contained in appendix B of OAC rule 3745-21-10 (unless the dynamic pressure performance test is not applicable to the specific Stage II vapor control system, as specified in the applicable CARB certification).
 - c. Not later than 30 days prior to any required tests, the permittee shall submit a test notification to the Ohio EPA or its delegated local air agency. The test notification shall describe the proposed test methods and procedures, the time and the date of the tests, and the person who will be conducting the tests. Failure to submit such notification prior to the tests may result in the Ohio EPA's refusal to accept the results of the tests. Personnel from the Ohio EPA or its delegated local air agency shall be permitted to witness the tests, examine the testing equipment, and acquire data and information during the tests. After completion of any tests, the permittee shall complete and retain on site a copy of the post test inspection form contained in appendix C of OAC rule 3745-21-10.
- (2) The permittee shall perform and comply with any vapor control system tests (i.e., static leak tests, air-to-liquid ratio, etc.) specified in the applicable CARB certification for the vapor control system installed. The tests shall be performed at the frequency specified in the CARB certification. If the applicable CARB certification for the vapor recovery system does not include such testing requirements, the permittee shall, at a minimum, comply with the static leak and dynamic pressure test requirements at intervals specified in OAC rule 3745-21-09(DDD)(2).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(DDD)]

g) **Miscellaneous Requirements**

- (1) All Stage II vapor control systems, including all associated underground and above ground plumbing, shall be installed, tested, operated and maintained in accordance with the applicable CARB certification. Copies of CARB certification documents, including executive orders, approval letters, equipment advisories, and equivalent test procedures are available from the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(DDD)]

- (2) No later than January 1, 2017, all gasoline dispensing facilities equipped with stage II vapor control systems shall have decommissioned the stage II vapor control systems in accordance with the procedures outlined in paragraph (DDD)(5)(d) of this rule.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(DDD)]

10. P019, No. 4 Coating Line

Operations, Property and/or Equipment Description:

Molten aluminum hot dip coating of steel coils. This emissions unit includes the following coating line operations: natural gas fired furnace (with direct-fired and indirect-fired portions), rust preventative oil application, anti-galling spray application, aluminum coating pot, and a prelube oil application.

- 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
All Activities		
a.	OAC rule 3745-17-07(A)(1)	See b)(2)a.
b.	OAC rule 3745-17-11	See b)(2)b.
c.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)c.
Oil Application		
e.	OAC rule 3745-21-09(OO)	See b)(2)d.
Indirect-fired Portion of Furnace		
f.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per MMBtu of actual heat input.
g.	40 CFR Part 63, Subpart DDDDD [40 CFR 63.7480-7575] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters	Table 3 to 40 CFR Part 63, Subpart DDDDD – Work Practice Standards [40 CFR 63.7500]. See c)(2). Pursuant to 40 CFR 63.7495(b), the permittee shall comply with this subpart no later than January 31, 2016, except as provided in 63.6(i).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.7499 and 63.7575, this emissions unit includes an existing process heater designed to burn gas 1 subcategory fuel subject to the work practices specified in this section.]	
h.	40 CFR Part 63, Subpart A [40 CFR 63.7565]	Table 10 to 40 CFR Part 63, Subpart DDDDD – Applicability of General Provisions (Subpart A) to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

- a. This emissions unit is exempt from the visible particulate matter 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.
- b. The uncontrolled mass rate of particulate emissions from the combustion of natural gas in the preheater of 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.
- c. The permittee shall minimize overspray when coating operations are performed in order to minimize or eliminate visible emissions of fugitive dust.
- d. The VOC content of coatings employed in this emissions unit shall not exceed the following:
 - i. For rust preventative oils, the VOC content shall not exceed 3.3 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(2).
 - ii. For anti-galling materials, the VOC content shall not exceed 1.2 pounds of VOC per gallon of material, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(3).
 - iii. For prelube oils, the VOC content shall not exceed 0.8 pound per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(4).

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)]

- (2) The permittee shall comply with the applicable work practices required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7500(a)(1), (b), (e) and (f) 63.7515(d) 63.7540(a), and Table 3 to Subpart DDDDD	annual tune-up requirements
63.7500(a)(1), (b), (e) and (f) and Table 3 to Subpart DDDDD	one-time energy assessment requirements
63.7500(a)(3)	general duty to minimize emissions

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD]

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)]

- (2) The permittee shall collect and record the following information on a monthly basis:
- a. the name and identification of each coating (rust preventative oil, anti-galling material and prelube oil), as applied; and
 - b. the VOC content, in pounds per gallon, excluding water and exempt solvents, of each rust preventative oil, anti-galling material and prelube oil, as applied.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(f)]

- (3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions of fugitive dust from the fugitive egress points for this emissions unit. The presence or absence of any



visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7555(a), (h), (i), and (j)	required overall records to be maintained
63.7560	record format and retention requirements

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

e) Reporting Requirements

- (1) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any monthly record showing that a non-compliant rust preventative oil, prelube oil or anti-galling material was employed. The notification shall include a copy of such record and shall be sent to the Southwest Ohio Air Quality Agency within 30 days after the end of the calendar quarter during which the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(g)]



Effective Date: To be entered upon final issuance

- (2) The permittee shall submit quarterly deviation reports that identify each day when a fuel other than natural gas was burned in this emissions unit.

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)]

- (3) The permittee shall submit semiannual reports that identify:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (4) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7530(d), (e) and (f)	Notification of Compliance Status requirements
63.7545(a), (b), (e), (f), and (h)	
63.7550(a) – (c) and (h) and Table 9 to Subpart DDDDD	content and submission of compliance reports

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

f) Testing Requirements

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

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.



Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

Visible emission observations shall be made at the egress points (e.g., doors closest to the coating operation) of the building housing the coating operation.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

b. Emission Limitations:

- i. For rust preventative oils, the VOC content shall not exceed 3.3 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(2).
- ii. For anti-galling materials, the VOC content shall not exceed 1.2 pounds of VOC per gallon of material, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(3).
- iii. For prelube oils, the VOC content shall not exceed 0.8 pound per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(4).

Applicable Compliance Method:

Compliance with the VOC content limitations specified in b)(2)d. may be demonstrated by the information collected and recorded in d)(2).

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10(B), and OAC rule 3745-21-09(OO)]

c. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per MMBtu of actual heat input.



Applicable Compliance Method:

Compliance with the particulate emission limitation may be determined in accordance with the following equation:

$$E \text{ (lb/MMBtu)} = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1000 \text{ Btu}) \times (1,000,000 \text{ Btu/MMBtu}) = 0.0019 \text{ lb/MMBtu}$$

Where: E = particulate emission rate from natural gas, in lb/MMBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate matter from burning natural gas, from AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1000 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/MMBtu = conversion from Btu to MMBtu.

If required, the permittee shall demonstrate compliance with the emission limitation through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-10(B)]

g) Miscellaneous Requirements

- (1) None.



11. P022, No. 3 Coating Line

Operations, Property and/or Equipment Description:

Molten zinc hot dip coating of steel coils. This emissions unit includes the following coating line operations: natural gas-fired furnace (with direct-fired and indirect-fired portions), rust preventative oil application, zinc coating application, and prelube oil application.

- 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
All Activities		
a.	OAC rule 3745-17-07(A)(1)	See b)(2)a.
b.	OAC rule 3745-17-11	See b)(2)b.
c.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)c.
Oil Application		
e.	OAC rule 3745-21-09(OO)	See b)(2)d.
Indirect-fired Portion of Furnace		
f.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per MMBtu of actual heat input.
g.	40 CFR Part 63, Subpart DDDDD [40 CFR 63.7480-7575] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters	Table 3 to 40 CFR Part 63, Subpart DDDDD – Work Practice Standards [40 CFR 63.7500]. See c)(2). Pursuant to 40 CFR 63.7495(b), the permittee shall comply with this subpart no later than January 31, 2016, except as provided in 63.6(i).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.7499 and 63.7575, this emissions unit includes an existing process heater designed to burn gas 1 subcategory fuel subject to the work practices specified in this section.]	
h.	40 CFR Part 63, Subpart A [40 CFR 63.7565]	Table 10 to 40 CFR Part 63, Subpart DDDDD – Applicability of General Provisions (Subpart A) to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

- a. This emissions unit is exempt from the visible particulate matter 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.
- b. The uncontrolled mass rate of particulate emissions from the combustion of natural gas in the preheater of 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.
- c. The permittee shall minimize overspray when coating operations are performed in order to minimize or eliminate visible emissions of fugitive dust.
- d. The VOC content of coatings employed in this emissions unit shall not exceed the following:
 - i. For rust preventative oils, the VOC content shall not exceed 3.3 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(2).
 - ii. For prelube oils, the VOC content shall not exceed 0.8 pound per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(4).

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)]

- (2) The permittee shall comply with the applicable work practices required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7500(a)(1), (b), (e) and (f) 63.7515(d) 63.7540(a), and Table 3 to Subpart DDDDD	annual tune-up requirements
63.7500(a)(1), (b), (e) and (f) and Table 3 to Subpart DDDDD	one-time energy assessment requirements
63.7500(a)(3)	general duty to minimize emissions

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD]

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)]

- (2) The permittee shall collect and record the following information on a monthly basis:
- a. the name and identification of each coating (rust preventative oil and prelube oil), as applied; and
 - b. the VOC content, in pounds per gallon, excluding water and exempt solvents, of each rust preventative oil and prelube oil, as applied.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(f)]

- (3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions of fugitive dust from the fugitive egress points for this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;



Effective Date: To be entered upon final issuance

- 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (4) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7555(a), (h), (i), and (j)	required overall records to be maintained
63.7560	record format and retention requirements

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

e) Reporting Requirements

- (1) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any monthly record showing that a noncompliant rust preventative oil or prelube oil was employed. The notification shall include a copy of such record and shall be sent to the Southwest Ohio Air Quality Agency within 30 days after the end of the calendar quarter during which the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(g)]

- (2) The permittee shall submit quarterly deviation reports that identify each day when a fuel other than natural gas was burned in this emissions unit.



Effective Date: To be entered upon final issuance

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)]

- (3) The permittee shall submit semiannual reports that identify:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (4) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7530(d), (e) and (f)	Notification of Compliance Status requirements
63.7545(a), (b), (e), (f), and (h)	
63.7550(a) – (c) and (h) and Table 9 to Subpart DDDDD	content and submission of compliance reports

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

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

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).



Visible emission observations shall be made at the egress points (e.g., doors closest to the coating operation) of the building housing the coating operation.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

b. Emission Limitations:

- i. For rust preventative oils, the VOC content shall not exceed 3.3 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(2).
- ii. For prelube oils, the VOC content shall not exceed 0.8 pound per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(4).

Applicable Compliance Method:

Compliance with the VOC content limitations specified in b)(2)d. may be demonstrated by the information collected and recorded in d)(2).

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10(B), and OAC rule 3745-21-09(OO)]

c. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per MMBtu of actual heat input.

Applicable Compliance Method:

Compliance with the particulate emission limitation may be determined in accordance with the following equation:

$$E \text{ (lb/MMBtu)} = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1000 \text{ Btu}) \times (1,000,000 \text{ Btu/MMBtu}) = 0.0019 \text{ lb/MMBtu}$$

Where: E = particulate emission rate from natural gas, in lb/MMBtu;



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

1.9 lb/10⁶ scf = emission factor for filterable particulate matter from burning natural gas, from AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1000 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/MMBtu = conversion from Btu to MMBtu.

If required, the permittee shall demonstrate compliance with the emission limitation through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-10(B)]

g) Miscellaneous Requirements

- (1) None.

12. P043, Wilputte Quench Tower

Operations, Property and/or Equipment Description:

Wilputte coke oven quench 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 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-11(B)(1)	PE shall not exceed 64.8 pounds per hour. See b)(2)a.
c.	40 CFR Part 63, Subpart CCCCC [40 CFR 63.7280 – 63.7352] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Ovens: Pushing, Quenching, and Battery Stacks [In accordance with 40 CFR 63.7282 and 63.7352, this emissions unit is a quench tower at an existing coke oven battery subject to the requirements specified in this section.]	The concentration of total dissolved solids (TDS) in the water used for quenching must not exceed 1,100 milligrams per liter (mg/L) in quenching water. See c)(1).
d.	40 CFR Part 63, Subpart A [40 CFR 63.7350]	Table 1 to subpart CCCCC of CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart CCCCC shows which parts of the General Provisions in 40 CFR 63.1- 63.15 apply.



(2) Additional Terms and Conditions

- a. The particulate emission limitation of 64.8 pounds per hour is based upon a process weight rate of 350.87 tons per hour (coke and water) and Table I of OAC rule 3745-17-11. Figure II of OAC rule 3745-17-11 does not apply because the uncontrolled mass rate of emissions cannot be ascertained.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart CCCCC, including the following sections:

63.7295(a)(2)	Use acceptable makeup water
63.7295(b)	Quench tower design, operation, inspection and maintenance requirements
63.7295(c)	Requests for alternative work practice standards
63.7300(a)	General duty to minimize emissions
63.7310(c)	Startup, shutdown, and malfunction plan

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63, Subpart CCCCC]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart CCCCC, including the following sections:

63.7333(f)	Continuous compliance demonstration requirements for TDS limit for quenching
63.7334(e)	Continuous compliance demonstration requirements for work practice standards (baffles and makeup water)
63.7342(a) and (d)	Required overall records to be maintained
63.7343(a)-(c)	Format and retention of records

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCCCC]

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart CCCCC, including the following sections:



63.7336(a)	Deviation reporting
63.7340(a)	Overall notification reporting requirements
63.7341(a)	Compliance report due dates
63.7341(c)	Semiannual compliance report contents
63.7341(d)	Immediate startup, shutdown and malfunction reports
63.7341(e)	Title V monitoring report allowance

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCCCC]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

b. Emission Limitation:

Particulate emissions shall not exceed 64.8 pounds per hour.

Applicable Compliance Method:

The particulate emission limitation of 64.8 pounds per hour is based upon a maximum process weight rate of 350.87 tons per hour (coke and water) and Table I of OAC rule 3745-17-11.

Compliance may be demonstrated from the TDS testing of the quench water below to obtain a particulate emission factor (in pounds of PE per ton of coal



charged) from AP-42 Section 12, Table 12.2-12, dated 5/2008, and multiplying by the maximum hourly tons of coal charged (126 tons coal charged/hour).

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11]

c. Emission Limitation:

The concentration of total dissolved solids (TDS) in the water used for quenching must not exceed 1,100 milligrams per liter (mg/L).

Applicable Compliance Method:

Compliance shall be demonstrated by the water sample monitoring and record keeping requirements specified in d)(1) and the testing requirements specified in f)(2) below.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCCCC]

(2) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart CCCCC, including the following sections:

63.7310(a)	General compliance requirements.
63.7320(b)-(c), 63.7326(c)	Initial performance tests and compliance requirements
63.7325(a) and (b)	Test methods and initial compliance with quench water limits
63.7327(e) and (f)	Initial compliance demonstrations with work practice standards
63.7328(a) and (d)	Initial compliance demonstrations with operation and maintenance requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCCCC]

g) Miscellaneous Requirements

(1) None.

13. P047, HMT/Desulfurization Station

Operations, Property and/or Equipment Description:

Hot metal pouring and desulfurization

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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)(3)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a. The grain of particulate emissions per dry standard cubic foot limitation required by this rule is less stringent than the limitation established pursuant to 40 CFR Part 63, Subpart FFFFF.
d.	OAC rule 3745-17-11(B)	Total particulate emissions from all stacks associated with this emissions unit, combined, shall not exceed 50 pounds per hour. See b)(2)e.
e.	OAC rule 3745-18-15(C)(10)	Sulfur dioxide emissions shall not exceed 0.40 pound of sulfur dioxide per ton of product from the station. This emissions unit shall not be operated when emissions unit P956 is in operation. See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	<p>40 CFR Part 63, Subpart FFFFF (40 CFR Part 63.7780-7852)</p> <p>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel Manufacturing Facilities</p> <p>[In accordance with 40 CFR 63.7782 (c), this emissions unit is a shop ancillary operation of an existing basic oxygen process furnace (BOPF) shop located at an integrated steel manufacturing facility subject to the emissions limitations and control measures specified in this section.]</p>	See b)(2)c. and c)(1).
g.	40 CFR Part 63, Subpart A (40 CFR 63.7850)	Table 4 to Subpart FFFFF of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart FFFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
h.	OAC rule 3745-31-05(A)(3) (PTI 18-055, issued October 31, 1977)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust from the hot metal pouring and desulfurization process. The control equipment associated with the hot metal pouring and desulfurization process shall meet the following requirements:
 - i. 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.
- b. Based on information provided in AP-42, Fifth Edition, Section 12.5.2.3, Emissions and Controls for hot metal desulfurization, and emission information provided by AK Steel, the potential to emit for sulfur dioxide emissions from this emissions unit is well below the allowable emission rate; therefore, it is not necessary to establish monitoring, record keeping, and reporting requirements to ensure ongoing compliance. AP-42 lists no SO₂ emissions from the hot metal desulfurization process, and the permittee estimates 1.5 lbs/hr SO₂, at maximum production levels. This equates to a maximum emission rate well below the allowable SO₂ emission limit listed in b)(1) of this permit.

- c. Pursuant to Table 1 of Subpart FFFFF of 40 CFR Part 63, the baghouse shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases. Particulate emissions from this emissions unit are vented to baghouse P047BH01.
- d. No applicable emission limitations or control measures were established for this emissions unit in PTI 18-055.
- e. The particulate emissions limitation of 50 pounds per hour is based upon an uncontrolled emission rate of 1090 pounds PE per hour and Figure II of OAC rule 3745-17-11. This limit is more stringent than that determined using the maximum process weight of 1000 tons per hour and Table I of OAC rule 3745-17-11

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7800(a)	General duty to minimize emissions.
63.7810(c)	Startup, shutdown, and malfunction plan.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart FFFFF]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain a record of all times this emissions unit was in operation concurrently with emissions unit P956.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-15(C)]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7830(b)	Baghouse monitoring and inspection requirements
63.7831(a)-(d)	Site-specific monitoring plan and continuous parameter monitoring system (CPMS) requirements
63.7831(f)	Bag leak detection system requirements
63.7832(a)-(b)	Continuous monitoring and data collection requirements
63.7833(a), Table 3 of Subpart FFFFF	Continuous compliance demonstration requirements for emission limits



63.7833(c)	Continuous compliance demonstration requirements for each baghouse
63.7842(a)-(d)	Required overall records to be maintained
63.7843(a)-(c)	Format and retention of records

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #18-055, issued on October 31, 1977:d(1) - d(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any time periods when emissions units P956 and P047 were in operation at the same time.

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 OAC rule 3745-18-15(C)]

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7835(a)	Deviation reporting
63.7840(a)	Overall notification reporting requirements
63.7840(d)	Notification of intent to test
63.7840(e)	Notification of compliance status
63.7841(a)	Compliance report due dates
63.7841(b)	Compliance report contents
63.7841(c)	Immediate startup, shutdown, and malfunction reports
63.7841(d)	Title V monitoring report allowance

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (3) 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 #18-055, issued on October 31, 1977:e)(1) - 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 compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The points of observation for visible emission observations shall include any non-stack egress points from the BOF building housing this emissions unit. Such egress points shall include, but are not limited to: doorways, windows, and roof monitors.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).



No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

c. Emission Limitation:

Sulfur dioxide emissions shall not exceed 0.40 pound of sulfur dioxide per ton of product from the station.

Applicable Compliance Method:

If required, compliance shall be determined through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 and the procedures specified in OAC rule 3745-18-04.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-15(C), and OAC rule 3745-18-04]

d. Emission Limitation:

Total particulate emissions from all stacks associated with this emissions unit, combined, shall not exceed 50 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be determined through use of MACT limit of 0.01 grain/dscf multiplied by 80,000 acfm (the volumetric design flowrate to the HMT baghouse P047BH01) multiplied by 60 minutes/hour and divided by 7000 grains/pound.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(B), and OAC rule 3745-17-03(B)(10)]

e. Emission Limitation:

The baghouse shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

The actual emission rate shall be calculated from the results of the most recent stack test which demonstrated compliance*. The permittee shall conduct emission testing in accordance with the requirements of 40 CFR Part 63, Subpart FFFFF. See f)(2) and f)(3).



*NOTE: baghouse P047BH01 controls particulate emissions from this emissions unit. Pursuant to Subpart FFFFF, the permittee must conduct performance tests no less frequently than once during the term of this Title V permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (2) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7810(a)	General compliance requirements
63.7820(a)	Initial performance tests and compliance requirements
63.7821(a) and (c)	Subsequent performance tests [see f)(1)d. above]
63.7822(a), (b), and (h)	Performance test requirements and test methods
63.7825(a) and (c)	Initial compliance demonstrations with emission limitations
63.7835(b)	Startups, shutdowns, and malfunctions

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

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

- a. The emission testing shall be conducted between 12 and 24 months of the effective date of this permit.
- b. The emission testing shall be conducted at the outlet of P047BH01 (baghouse control device) to demonstrate compliance with the allowable mass emission limitation for particulates of 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases.
- c. The test method(s) and procedures outlined in 40 CFR 63.7822 shall be employed to demonstrate compliance with the allowable mass emission rate.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
- f. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #18-055, issued on October 31, 1977:f(1) – f(3). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

14. P062, No. 2 EG Line

Operations, Property and/or Equipment Description:

Electrogalvanizing line consisting of a precleaning station (uncontrolled), a caustic degreasing station (uncontrolled), a surface preparation tank, an electrogalvanizing tank, and dissolving station (the surface preparation tank, electrogalvanizing tank, and dissolving station are vented to two packed bed scrubbers in parallel).

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 14-3806, issued October 28, 1998)	<p>The total PE from the exhaust gases exiting the stacks associated with scrubber P062SC01, scrubber P062SC02, the caustic degreasing station, and the precleaning station, combined, shall not exceed 5.36 pounds PE per hour and 23.5 tons per year.</p> <p>The total PM₁₀ emissions from the exhaust gases exiting the stacks associated with scrubber P062SC01, scrubber P062SC02, the caustic degreasing station, and the precleaning station, combined, shall not exceed 4.22 pounds PM₁₀ per hour and 18.5 tons per year.</p> <p>The total VOC emissions from the exhaust gases exiting the stacks associated with scrubber P062SC01, scrubber P062SC02, the caustic degreasing station, and the precleaning station, combined, shall not exceed 7.5 pounds per hour and 32.9 tons per year.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See c)(1). The requirements of this rule also include compliance with OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), 3745-17-08(B), 3745-21-09(OO)(2), and 3745-21-09(OO)(4).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
c.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
e.	OAC rule 3745-17-11(B)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-21-09(OO)	See b)(2)a.

(2) Additional Terms and Conditions

- a. The VOC content of coatings employed in this emissions unit shall not exceed the following:
 - i. For rust preventative oils, the VOC content shall not exceed 3.3 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(2).
 - ii. For prelube oils, the VOC content shall not exceed 0.8 pound per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(4).

c) Operational Restrictions

- (1) The emissions from the surface preparation tank, electrogalvanizing tank, and dissolving station shall be vented to packed bed scrubbers (P062SC01 and P062SC02, in parallel).
 [Authority for Term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the

scrubber stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the fugitive egress points for this emissions unit. The presence or absence of any visible fugitive 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 location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and

- e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (3) The permittee shall collect and record the following information on a monthly basis:
 - a. the name and identification of each coating (rust preventative and prelube oil), as applied; and
 - b. the VOC content, in pounds per gallon, excluding water and exempt solvents, of each rust preventative and prelube oil, as applied.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(f)]

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-3806, issued on October 28, 1998:d)(1) - d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports that identify:
 - a. all days during which any visible particulate emissions were observed from the scrubber stacks serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (2) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any monthly record showing that a non-compliant rust preventative oil or prelube oil was employed. The notification shall include a copy of such record and shall be sent to the Southwest Ohio Air Quality Agency within 30 days after the end of the calendar quarter during which the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(g)]

- (3) 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 #14-3806, issued on October 28, 1998:e)(1) – 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 compliance with the underlying reporting requirements in the Permit to Install.

f) **Testing Requirements**

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

a. **Emission Limitation:**

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

Visible emission observations shall be made at the egress points (e.g., doors closest to the EG operation) of the building housing the EG operation.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]



b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

c. Emission Limitations:

i. For rust preventative oils, the VOC content shall not exceed 3.3 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(2).

ii. For prelube oils, the VOC content shall not exceed 0.8 pound per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(4).

Applicable Compliance Method:

Compliance with the VOC content limitations specified in b)(2)a. may be demonstrated by the information collected and recorded in d)(3).

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-21-10(B), and OAC rule 3745-21-09(OO)]

d. Emission Limitations:

The total PE from the exhaust gases exiting the stacks associated with scrubber P062SC01, scrubber P062SC02, the caustic degreasing station, and the precleaning station, combined, shall not exceed 5.36 pounds PE per hour and 23.5 tons per year.



The total PM₁₀ emissions from the exhaust gases exiting the stacks associated with scrubber P062SC01, scrubber P062SC02, the caustic degreasing station, and the precleaning station, combined, shall not exceed 4.22 pounds PM₁₀ per hour and 18.5 tons per year.

Applicable Compliance Method:

Compliance shall be determined through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, the procedures specified in OAC rule 3745-17-03(B)(10) and previous emission testing performed at AK Steel for the precleaning station and caustic degreasing station. The particulate emission rate of 0.08 lb/hr from the precleaning and caustic degreasing station as determined during the December 16, 1991 emission test, shall be added to the particulate emission rate determined by the testing requirements specified in f)(2) to determine the total particulate emission rate.

Should additional testing be required to determine the particulate emission rate from the stacks associated with the precleaning and caustic degreasing stations stack, the testing shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, the procedures specified in OAC rule 3745-17-03(B)(10).

The annual emissions shall be determined by multiplying the hourly emissions by 8760 hours per year, then dividing by 2000 pounds per ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

e. **Emission Limitation:**

The total VOC emissions from the exhaust gases exiting the stacks associated with scrubber P062SC01, scrubber P062SC02, the caustic degreasing station, and the precleaning station, combined, shall not exceed 7.5 pounds per hour and 32.9 tons per year.

Applicable Compliance Method:

The hourly VOC emissions are based upon the emission factors and calculations provided by AK Steel in the application for PTI #14-3806, submitted on March 6, 1995. If required, compliance shall be demonstrated through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25.

The annual emissions shall be determined by multiplying the hourly emissions by 8760 hours per year then dividing by 2000 pounds per ton.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements.
- a. The emission testing shall be conducted within 12 months of the effective date of this permit.
 - b. The emission testing shall be conducted at the outlet of scrubbers P062SC01 and P062SC02 to demonstrate compliance with the allowable mass emission limitation for particulates of 5.36 pounds per hour. See f)(1)d. for additional information.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

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

Visible emission readings shall be performed using U.S. EPA Method 9 on the Precleaner Stack ID No. P0620 and Caustic Degreaser Stack ID No. P0621 associated with this emissions unit during each test run.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.
 - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - e. Not less than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
 - f. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.



- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-3806, issued on October 28, 1998:f(1) - f(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

15. P065, No. 3 Cold Mill

Operations, Property and/or Equipment Description:

Cold rolling steel 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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)b.
d.	OAC rule 3745-17-11	Total particulate emissions from all stacks associated with this emissions unit shall not exceed 74.9 pounds per hour. See b)(2)a.
e.	OAC rule 3745-21-09(OO)(1)	The VOC content of the rolling oil employed shall not exceed 6.9 pounds of VOC per gallon of oil, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. The particulate emissions limitation of 74.9 pounds per hour is based upon a process weight rate of 812 tons per hour and Table I of OAC rule 3745-17-11. Figure II of OAC rule 3745-17-11 does not apply because the uncontrolled mass rate of emissions cannot be ascertained.

- b. When cold rolling of strip steel is occurring, the permittee shall vent fugitive emissions to the settling chamber to minimize fugitive dust emissions. The capture efficiency of the cold mill settling chamber shall be sufficient to minimize or eliminate visible emissions of fugitive dust.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the

fugitive egress points for this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (3) The permittee shall collect and record the following information on a monthly basis:
 - a. the name and identification of each rolling oil, as applied; and
 - b. the VOC content, in pounds per gallon, excluding water and exempt solvents, of each rolling oil, as applied.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(f)]



e) Reporting Requirements

- (1) The permittee shall submit semiannual reports that identify all of the following:
 - a. all days during which any visible particulate emissions were observed from the stacks serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed at the fugitive egress points for this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (2) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any monthly record showing that a non-compliant rolling oil was employed. The notification shall include a copy of such record and shall be sent to the Southwest Ohio Air Quality Agency within 30 days after the end of the calendar quarter during which the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(g)]

f) Testing Requirements

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

- a. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The visible emission observations shall be performed at the appropriate non-stack egress points from this emissions unit.



No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

c. Emission Limitation:

Total PE from all stacks associated with this emissions unit shall not exceed 74.9 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10). See f)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11, and OAC rule 3745-17-03(B)(10)]

d. Emission Limitation:

For rolling oils, the VOC content shall not exceed 6.9 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(1).

Applicable Compliance Method:

Compliance with the VOC content limitations specified in b)(1)e. may be demonstrated by the information collected and recorded in d)(3).

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10(B), and OAC rule 3745-21-09(OO)]

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements.

- a. The emission testing shall be conducted within 18 months of the effective date of this permit.
- b. The emission testing shall be conducted at the outlet of the settling chamber to demonstrate compliance with the allowable mass emission limitation for particulates.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate:

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

Visible emission readings, using USEPA Method 9, shall be performed during each test run.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result



in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).

- f. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11, and OAC rule 3745-17-03(B)(10)]

g) Miscellaneous Requirements

- (1) None.

16. P067, Gas Holder/Flare

Operations, Property and/or Equipment Description:

Gas holder and flare for excess coke oven gas

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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
b.	OAC rule 3745-18-15(C)(8)	The hydrogen sulfide content of the coke oven gas vented to the flare shall not exceed 280 grains of hydrogen sulfide per 100 dry standard cubic feet of coke oven gas based on a thirty-day average.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the flare. The presence or absence of any visible fugitive 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that the operation of the flare is “smokeless” for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates that the operation of the flare is not “smokeless”, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of “smokeless” operation of the flare.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

- (2) The permittee shall properly operate and maintain a device to continuously monitor the presence of a pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The pilot flame shall be maintained at all times in the flare's pilot light burner. The permittee shall record all periods during which the pilot flame was not present.

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

- (3) The permittee shall collect daily grab samples of the coke oven gas for analysis of the hydrogen sulfide content. A minimum of one sample shall be taken each day on Monday through Friday of each week, except for any day(s) when no gas is delivered to this emissions unit. The hydrogen sulfide content of each of the samples shall be determined using the “Tutwiler Method,” and the resulting hydrogen sulfide content shall be expressed in terms of grains of hydrogen sulfide per 100 dry standard cubic feet of coke oven gas. The hydrogen sulfide content of each of the daily samples during the week shall be averaged to estimate the hydrogen sulfide content of the coke oven gas burned on the weekend and on any days when no gas is delivered to the vessel. The grains of hydrogen sulfide (H₂S) per 100 dry standard cubic feet of COG shall be converted to the decimal fraction of sulfur by multiplying the grains of H₂S per 100 cubic feet times 1 pound H₂S per 7000 grains of H₂S and times 0.94 pound of sulfur per 1

pound of H₂S, dividing by 100 (dscft/hdscft), and then dividing by the density of COG (0.027 pound per cubic foot).

The permittee shall maintain daily records of the following information:

- a. the hydrogen sulfide content of the coke oven gas in grains per 100 dry standard cubic feet of coke oven gas burned from the sample(s) collected above; and,
- b. the rolling thirty-day average hydrogen sulfide content of the coke oven gas in grains per 100 dry standard cubic feet of coke oven gas burned.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-15(C), and OAC rule 3745-18-04]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible emissions. These reports shall be submitted to the Southwest Ohio Air Quality Agency 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)]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods during which the pilot flame was not present; and
 - b. all exceedances of the coke oven gas hydrogen sulfide content limitation specified in b)(1)b. of these terms and conditions.

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 OAC rule 3745-18-15(C)]

f) Testing Requirements

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

- a. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:



Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

b. Emission Limitation:

The hydrogen sulfide content of coke oven gas vented to the flare shall not exceed 280 grains of hydrogen sulfide per 100 dry standard cubic feet of coke oven gas based on a thirty-day average.

Applicable Compliance Method:

Compliance may be demonstrated by the information collected and recorded in d)(3) and d)(4). If testing is required, the hydrogen sulfide content of coke oven gas samples shall be determined using the "Tutwiler Method."

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-15]

g) Miscellaneous Requirements

- (1) None.

17. P068, Wilputte Exhausters

Operations, Property and/or Equipment Description:

Exhausters (2) for the coke oven gas distribution throughout the facility

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.	40 CFR Part 61, Subpart L [40 CFR 61.130-139] National Emission Standards for Benzene Emissions from Coke By-Product Recovery Plants [In accordance with 40 CFR 61.130, 61.131, and 61.137(b), this emissions unit is a piece of equipment (exhauster) in benzene service subject to the emissions standards and requirements specified in this section.]	Benzene emissions equal to or in excess of 10,000 ppm from an exhauster shall constitute a leak. [40 CFR 61.135(d)(1)] See c)(1).
b.	40 CFR Part 61, Subpart V [40 CFR 61.240-247] National Emission Standard for Equipment Leaks (Fugitive Emissions Sources)	Equipment in benzene service shall comply with the requirements of 40 CFR Part 61, Subpart V, except as provided in Subpart L. [40 CFR 61.135(a)] See c)(1).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational requirements under 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V, including the following sections:

61.135(c)	Labeling requirements for equipment in benzene service
61.135(d)(2); 61.242-10(a)-(b); 61.246(b)	Repair requirements for detection of leaks from equipment in benzene service

[Authority for Term: OAC rule 3745-77-07(A)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V, including the following sections:

61.135(d); 61.245(b)	Monitoring requirements for exhausters in benzene service
61.138(c); 61.246(a)- (j)	Recordkeeping requirements for equipment in benzene service

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V, including the following sections:

61.138(e) and (g); 61.247(a)	Initial notification
61.138(f); 61.247(b)	Semiannual reporting requirements

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

f) Testing Requirements

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



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

a. Emission Limitation:

Benzene emissions equal to or in excess of 10,000 ppm from an exhauster shall constitute a leak.

Applicable Compliance Method:

Compliance with the leak detection and repair provisions specified in b)(1) and c)(1) and shall be demonstrated by the information collected and recorded in d)(1) of these terms and conditions and the methods outlined in 40 CFR 61.245.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

g) Miscellaneous Requirements

(1) None.

18. P070, Final Cooler, Wash Oil Tank & Wash Oil Decanter

Operations, Property and/or Equipment Description:

By-products plant equipment including the final cooler, wash oil tanks and decanter, equipped with gas blanketing.

- 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.	40 CFR Part 61, Subpart L [40 CFR 61.130-139] National Emission Standards for Benzene Emissions from Coke By-Product Recovery Plants [In accordance with 40 CFR 61.130 and 61.131, this emissions unit consists of a final cooler, wash oil tanks and decanter subject to the emissions standards and requirements specified in this section.]	See b)(2)a., b)(2)b., and c)(1).
b.	40 CFR Part 61, Subpart V [40 CFR 61.240-247] National Emission Standard for Equipment Leaks (Fugitive Emissions Sources)	Test methods and procedures in 61.245(d) as specified in Subpart L. [40 CFR 61.137(a) and (b)] See b)(2)a. and b)(2)c.
c.	40 CFR Part 61, Subpart FF [40 CFR 61.340-359] National Emission Standard for Benzene Waste Operations	See b)(2)d.

(2) Additional Terms and Conditions

- a. The permittee shall operate and maintain a gas blanketing system for the by-products recovery plant in accordance with the requirements of 40 CFR 61.132. Pursuant to 40 CFR 61.132(a) of Subpart L, the permittee shall duct gases from each process vessel to the gas collection system, gas distribution system, or other enclosed point in the by-product recovery process where the benzene in the gas will be recovered or destroyed. This control system shall be designed and operated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined by the methods specified in 40 CFR 61.245(c) of Subpart V. This system can be designed as a closed, positive pressure, gas blanketing system.
 - i. Except, the permittee may elect to install, operate, and maintain a pressure relief device, vacuum relief device, an access hatch, and a sampling port on each process vessel, tar storage tank, and tar-intercepting sump. Each access hatch and sampling port must be equipped with a gasket and a cover, seal, or lid that must be kept in a closed position at all times, unless in actual use.
- b. No (zero) emissions are allowed from the final coolers or the final-cooler cooling towers at the coke by-product recovery plant pursuant to 40 CFR 61.134.
- c. The permittee has indicated that the ancillary equipment associated with this emissions unit is not "in benzene service" as defined in 40 CFR Part 61.131. Therefore, the leak detection and repair provisions specified in 61.135 of Subpart L and related provisions of Subpart V do not apply. In accordance with 40 CFR 61.137(b), the provisions of 61.245(d) in Subpart V shall be used to demonstrate the equipment is not in benzene service. See d)(2) below.
- d. As identified in the permittee's Title V application, the total annual benzene quantity from facility waste is less than 10 megagrams (Mg) per year (11 tons per year), therefore the permittee is exempt from the general standards in 40 CFR 61.342(b) and (c) of Subpart FF pursuant to 40 CFR 61.342(a). See d)(3) below.

c) Operational Restrictions

- (1) The permittee shall enclose and seal all openings on each process vessel.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 61, Subpart L]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V, including the following sections:

61.132(b); 61.245(c)	Monitoring and semiannual inspection requirements
61.132(c)	Annual maintenance inspection requirements
61.138(b)	Recordkeeping requirements for semiannual inspections and annual maintenance inspections
61.138(a)	Recordkeeping requirements for the design of control equipment installed
61.246(i)-(j)	Recordkeeping requirements for equipment not in VHAP service

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

- (2) The permittee shall maintain records in accordance with 40 CFR 61.246(i) that demonstrate that the ancillary equipment associated with this emissions unit is not “in benzene service” as defined in 40 CFR Part 61.131. As specified in 40 CFR 61.137(b), to determine whether or not a piece of equipment is in benzene service, the methods in 40 CFR 61.245(d) shall be used.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

- (3) The permittee shall maintain records of the calculated total annual benzene quantity from facility waste determined in accordance with 40 CFR 61.342(a) and the procedures specified in 40 CFR 61.355.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 61, Subpart FF]

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 61, Subparts L, V, and FF, including the following sections:

61.138(e) and (g); 61.247(a); 61.357(a) and (b)	Initial notification
61.138(f);	Semiannual reporting requirements
61.357(b) and (c)	Reporting requirements for changes in operations affecting total annual benzene quantity from facility waste

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, 40 CFR Part 61, Subpart V, and 40 CFR Part 61, Subpart FF]

f) Testing Requirements

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

a. Emission Limitations:

The control system shall be designed and operated for no detectable emissions pursuant to 40 CFR 61.132(b).

No (zero) emissions are allowed from the final coolers or the final-cooler cooling towers at the coke by-product recovery plant pursuant to 40 CFR 61.134.

Applicable Compliance Method:

Compliance with 40 CFR Part 61, Subpart L, shall be determined by a review of records, review of performance test results, inspections, or any combination thereof, using the methods and procedures specified in 40 CFR 61.137 and 61.245.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

g) Miscellaneous Requirements

- (1) None.



19. P075, Wilputte Tar & Flushing Liquor Vessels

Operations, Property and/or Equipment Description:

By-products plant equipment including tar and flushing liquor processing vessels, equipped with gas blanketing.

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.	40 CFR Part 61, Subpart L [40 CFR 61.130-139] National Emission Standards for Benzene Emissions from Coke By-Product Recovery Plants [In accordance with 40 CFR 61.130 and 61.131, this emissions unit consists of a tar and flushing liquor processing vessels subject to the emissions standards and requirements specified in this section.]	See b)(2)a. and c)(1).
b.	40 CFR Part 61, Subpart V [40 CFR 61.240-247] National Emission Standard for Equipment Leaks (Fugitive Emissions Sources)	Test methods and procedures in 61.245 as specified in Subpart L. [40 CFR 61.137(a) and (b)] See b)(2)a. and b)(2)b.
c.	40 CFR Part 61, Subpart FF [40 CFR 61.340-359] National Emission Standard for Benzene Waste Operations	See b)(2)c.

(2) Additional Terms and Conditions

- a. The permittee shall operate and maintain a gas blanketing system for the by-products recovery plant in accordance with the requirements of 40 CFR 61.132. Pursuant to 40 CFR 61.132(a) of Subpart L, the permittee shall duct gases from each process vessel to the gas collection system, gas distribution system, or other enclosed point in the by-product recovery process where the benzene in the gas will be recovered or destroyed. This control system shall be designed and operated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined by the methods specified in 40 CFR 61.245(c) of Subpart V. This system can be designed as a closed, positive pressure, gas blanketing system.
 - i. Except, the permittee may elect to install, operate, and maintain a pressure relief device, vacuum relief device, an access hatch, and a sampling port on each process vessel, tar storage tank, and tar-intercepting sump. Each access hatch and sampling port must be equipped with a gasket and a cover, seal, or lid that must be kept in a closed position at all times, unless in actual use.
 - ii. The permittee may elect to leave open to the atmosphere the portion of the liquid surface in each tar decanter necessary to permit operation of a sludge conveyor. If the permittee elects to maintain an opening on part of the liquid surface of the tar decanter, the permittee shall install, operate, and maintain a water leg seal on the tar decanter roof near the sludge discharge chute to ensure enclosure of the major portion of liquid surface not necessary for the operation of the sludge conveyor.
- b. The permittee has indicated that the ancillary equipment associated with this emissions unit is not "in benzene service" as defined in 40 CFR Part 61.131. Therefore, the leak detection and repair provisions specified in 61.135 of Subpart L and related provisions of Subpart V do not apply. In accordance with 40 CFR 61.137(b), the provisions of 61.245(d) in Subpart V shall be used to demonstrate the equipment is not in benzene service. See d)(2) below.
- c. As identified in the permittee's Title V application, the total annual benzene quantity from facility waste is less than 10 megagrams (Mg) per year (11 tons per year), therefore the permittee is exempt from the general standards in 40 CFR 61.342(b) and (c) of Subpart FF pursuant to 40 CFR 61.342(a). See d)(3) below.

c) Operational Restrictions

- (1) The permittee shall enclose and seal all openings on each process vessel.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 61, Subpart L]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V, including the following sections:

61.132(b); 61.245(c)	Monitoring and semiannual inspection requirements
61.132(c)	Annual maintenance inspection requirements
61.138(b)	Recordkeeping requirements for semiannual inspections and annual maintenance inspections
61.138(a)	Recordkeeping requirements for the design of control equipment installed
61.246(i)-(j)	Recordkeeping requirements for equipment not in VHAP service

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

- (2) The permittee shall maintain records in accordance with 40 CFR 61.246(i) that demonstrate that the ancillary equipment associated with this emissions unit is not “in benzene service” as defined in 40 CFR Part 61.131. As specified in 40 CFR 61.137(b), to determine whether or not a piece of equipment is in benzene service, the methods in 40 CFR 61.245(d) shall be used, except that, for exhausters, the percent benzene shall be 1 percent by weight, rather than the 10 percent by weight described in 40 CFR 61.245(d).

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

- (3) The permittee shall maintain records of the calculated total annual benzene quantity from facility waste determined in accordance with 40 CFR 61.342(a) and the procedures specified in 40 CFR 61.355.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 61, Subpart FF]

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 61, Subparts L, V, and FF, including the following sections:

61.138(e) and (g); 61.247(a); 61.357(a) and (b)	Initial notification
61.138(f);	Semiannual reporting requirements



Effective Date: To be entered upon final issuance

61.357(b) and (c)	Reporting requirements for changes in operations affecting total annual benzene quantity from facility waste
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[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, 40 CFR Part 61, Subpart V, and 40 CFR Part 61, Subpart FF]

f) Testing Requirements

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

a. Emission Limitation:

The control system shall be designed and operated for no detectable emissions pursuant to 40 CFR 61.132(b).

Applicable Compliance Method:

Compliance with 40 CFR Part 61, Subpart L, shall be determined by a review of records, review of performance test results, inspections, or any combination thereof, using the methods and procedures specified in 40 CFR 61.137 and 61.245.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

g) Miscellaneous Requirements

(1) None.

20. P094, Hot Strip Mill

Operations, Property and/or Equipment Description:

Hot rolling of steel slabs

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 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a.
c.	OAC rule 3745-21-09(OO)(1)	The VOC content of the rolling oil employed shall not exceed 6.9 pounds of VOC per gallon of oil, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. The permittee shall employ good operating practices when hot rolling steel slabs to minimize fugitive dust emissions.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions from the fugitive egress points of the building containing this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (2) The permittee shall collect and record the following information on a monthly basis:
 - a. the name and identification of each rolling oil employed, as applied; and
 - b. the VOC content, in pounds per gallon, excluding water and exempt solvents, of each rolling oil, as applied.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(f)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports that identify all of the following:
 - a. all days during which any visible emissions of fugitive dust were observed at the fugitive egress points for this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]



- (2) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any monthly record showing that a non-compliant rolling oil was employed. The notification shall include a copy of such record and shall be sent to the Southwest Ohio Air Quality Agency within 30 days after the end of the calendar quarter during which the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(g)]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The points of observation for visible emission observations shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to: doorways, windows, and roof monitors.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

b. Emission Limitation:

For rolling oils, the VOC content shall not exceed 6.9 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(1).

Applicable Compliance Method:

Compliance with the VOC content limitations specified in b)(1)c. may be demonstrated by the information collected and recorded in d)(2).

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10(B), and OAC rule 3745-21-09(OO)]

g) Miscellaneous Requirements

- (1) None.

21. P096, Wilputte Tar Decanter Tank

Operations, Property and/or Equipment Description:

Flushing liquor and tar decanter tank, equipped with gas blanketing.

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 paragraph 3745-31-05(A)(3), as effective 11/30/01. (PTI P0119365, issued August 27, 2015)	VOC emissions shall not exceed 0.256 pound per hour and 1.12 TPY. See b)(2)a.
b.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06.	See b)(2)b.
c.	40 CFR Part 61, Subpart L [40 CFR 61.130-139] National Emission Standards for Benzene Emissions from Coke By-Product Recovery Plants [In accordance with 40 CFR 61.130 and 61.131, this emissions unit consists of a tar and flushing liquor decanter tank subject to the emissions standards and requirements specified in this section.]	See b)(2)c. and c)(1).
d.	40 CFR Part 61, Subpart V [40 CFR 61.240-247] National Emission Standard for Equipment Leaks (Fugitive Emissions Sources)	Test methods and procedures in 61.245 as specified in Subpart L. [40 CFR 61.137(a) and (b)] See b)(2)c. and b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 61, Subpart FF [40 CFR 61.340-359] National Emission Standard for Benzene Waste Operations	See b)(2)e.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then 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 VOC emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year taking into account the federally enforceable requirements under 40 CFR Part 61, Subpart L.

c. The permittee shall operate and maintain a gas blanketing system for the by-products recovery plant in accordance with the requirements of 40 CFR 61.132. Pursuant to 40 CFR 61.132(a)(2) of Subpart L, the permittee shall duct gases from each process vessel, tar storage tank, and tar-intercepting sump to the gas collection system, gas distribution system, or other enclosed point in the by-product recovery process where the benzene in the gas will be recovered or destroyed. This control system shall be designed and operated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined by the methods specified in 40 CFR 61.245(c) of Subpart V. This system can be designed as a closed, positive pressure, gas blanketing system.

i. Except, the permittee may elect to install, operate, and maintain a pressure relief device, vacuum relief device, an access hatch, and a sampling port on each process vessel, tar storage tank, and tar-intercepting sump. Each access hatch and sampling port must be



Effective Date: To be entered upon final issuance

equipped with a gasket and a cover, seal, or lid that must be kept in a closed position at all times, unless in actual use.

ii. The permittee may elect to leave open to the atmosphere the portion of the liquid surface in each tar decanter necessary to permit operation of a sludge conveyor. If the permittee elects to maintain an opening on part of the liquid surface of the tar decanter, the permittee shall install, operate, and maintain a water leg seal on the tar decanter roof near the sludge discharge chute to ensure enclosure of the major portion of liquid surface not necessary for the operation of the sludge conveyor.

d. The permittee has indicated that the ancillary equipment associated with this emissions unit is not “in benzene service” as defined in 40 CFR Part 61.131. Therefore, the leak detection and repair provisions specified in 61.135 of Subpart L and related provisions of Subpart V do not apply. In accordance with 40 CFR 61.137(b), the provisions of 61.245(d) in Subpart V shall be used to demonstrate the equipment is not in benzene service. See d)(2) below.

e. As identified in the permittee’s Title V application, the total annual benzene quantity from facility waste is less than 10 megagrams (Mg) per year (11 tons per year), therefore the permittee is exempt from the general standards in 40 CFR 61.342(b) and (c) of Subpart FF pursuant to 40 CFR 61.342(a). See d)(3) below.

c) Operational Restrictions

(1) The permittee shall enclose and seal all openings on each process vessel, tar storage tank, and tar-intercepting sump.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 61, Subpart L]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V, including the following sections:

61.132(b); 61.245(c)	Monitoring and semiannual inspection requirements
61.132(c)	Annual maintenance inspection requirements
61.138(b)	Recordkeeping requirements for semiannual inspections and annual maintenance inspections
61.138(a)	Recordkeeping requirements for the design of control equipment installed
61.246(i)-(j)	Recordkeeping requirements for equipment not in VHAP service



[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

- (2) The permittee shall maintain records in accordance with 40 CFR 61.246(i) that demonstrate that the ancillary equipment associated with this emissions unit is not “in benzene service” as defined in 40 CFR Part 61.131. As specified in 40 CFR 61.137(b), to determine whether or not a piece of equipment is in benzene service, the methods in 40 CFR 61.245(d) shall be used.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

- (3) The permittee shall maintain records of the calculated total annual benzene quantity from facility waste determined in accordance with 40 CFR 61.342(a) and the procedures specified in 40 CFR 61.355.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 61, Subpart FF]

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0119365, issued August 27, 2015:d)(1) - d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 61, Subparts L, V, and FF, including the following sections:

61.138(e) and (g); 61.247(a); 61.357(a) and (b)	Initial notification
61.138(f);	Semiannual reporting requirements
61.357(b) and (c)	Reporting requirements for changes in operations affecting total annual benzene quantity from facility waste

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, 40 CFR Part 61, Subpart V, and 40 CFR Part 61, Subpart FF]

- (2) 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 P0119365, issued August 27, 2015:e)(1). 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 compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions shall not exceed 0.256 lb/hr and 1.12 TPY.

Applicable Compliance Method

The emission rate for VOC shall be demonstrated through calculations provided by the permittee in the application for PTI 14-06013 submitted on January 3, 2008, based on the emission factor of 0.0046 lb VOC/ton of coke provided in AP-42, Table 12.2-23 (05/2008), for a tar decanter with gas blanketing, assuming 8,760 hours of operation per year at maximum potential production rate of 487,500 tons of coke per year as follows:

$55.65 \text{ tons coke per hour} \times 0.0046 \text{ lb of VOC/ton of coke} = 0.256 \text{ lb/hr of VOC};$
and

$487,500 \text{ tons of coke per year} \times 0.0046 \text{ lb of VOC/ton of coke}/(2000 \text{ lbs/ton}) = 1.12 \text{ TPY of VOC.}$

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

The control system shall be designed and operated for no detectable emissions pursuant to 40 CFR 61.132(b).

Applicable Compliance Method:

Compliance with 40 CFR Part 61, Subpart L, shall be determined by a review of records, review of performance test results, inspections, or any combination thereof, using the methods and procedures specified in 40 CFR 61.137 and 61.245.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0119365, issued August 27, 2015:f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) None.



22. P901, Flux Handling

Operations, Property and/or Equipment Description:

Flux handling, including railcar and truck unloading and conveying of flux material to the BOF

- 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
<i>Truck and railcar unloading</i>		
a.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a.
<i>Conveyor and transfer points equipped with partial enclosure and baghouse</i>		
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)b.
f.	OAC rule 3745-17-11(B)	The emission limitation established by this rule is less stringent than the emission limitation pursuant to OAC rule 3745-17-08(B).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	40 CFR Part 64 <i>Compliance Assurance Monitoring (CAM)</i>	See b)(2)c., d)(1)-d)(3), d)(5), d)(6), e)(2), e)(3), and f)(2).

(2) Additional Terms and Conditions

a. In accordance with the permittee’s permit application, the permittee has committed to the following control measures for the truck and railcar unloading operations:

- i. use of bottom unloading for the railcar unloading operation; and
- ii. the maintenance of a two-sided building with a roof to enclose the truck dumping area.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust from the transfer and conveying operation to the baghouse P901BH01.

- i. The capture and ventilation system associated with the transfer and conveying operation shall have a collection efficiency that is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the fugitive egress points to the extent possible with good engineering design.
- ii. The control equipment shall achieve an outlet emissions rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases.

c. At all times, the permittee shall maintain P901BH01 differential pressure monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7]

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse.

When the emissions unit is operating, the baghouse operating parameters are measured by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(3). The baghouse indicator range for the pressure drop across the baghouse is specified in d)(2). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7]

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2 to 10 inches of water.

This range is 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 range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range 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), OAC rule 3745-17-08(B), and 40 CFR Part 64.3]

- (3) The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record once per day the pressure drop across the baghouse. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop varies from the range established in accordance with d)(2) of this permit, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the excursion was first observed;

- b. the magnitude of the excursion 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 an excursion, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range 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 excursion 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 corrective action was completed;
- h. the date and time the excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the pressure drop readings 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.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-08(B), 40 CFR Part 64.7, and 40 CFR Part 64.9]

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the fugitive egress points for this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (5) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the 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, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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 64.7]

- (6) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8]

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports that identify all of the following:

- a. all days during which any visible emissions of fugitive dust were observed at the fugitive egress points for this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (2) The permittee shall submit quarterly excursion reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;
 - b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in d)(2) and the cause of each incident;
 - c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with QA/QC or other calibration checks) while the emissions unit was in operation and the cause of each incident;
 - d. the corrective action(s) taken for each incident described in (a) and (b);
 - e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;
 - f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the baghouse pressure drop indicator ranges defined in d)(2) into an acceptable range, was determined to be necessary and was not taken; and
 - g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly 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), OAC rule 3745-17-08(B), and 40 CFR Part 64.9]

- (3) If the permittee is required under 40 CFR Part 64.8 and d)(6) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

b. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The visible emission observations shall be performed at the appropriate non-stack egress points from this emissions unit.



No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

c. Emission Limitation:

The control equipment shall achieve an outlet emissions rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10). See f)(2) below.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B)]

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

a. The emission testing shall be conducted within 18 months of the effective date of this permit.

b. The emission testing shall be conducted at the outlet of baghouse P901BH01 to demonstrate compliance with the allowable mass emission limitation for particulates and for compliance with the stack visible particulate emission limitation.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Methods 1 through 5 and Method 9 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. During the test, the temperature, the pressure drop across the baghouse shall be recorded at least every 15 minutes.

e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions 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 appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A)(1), OAC rule 3745-17-08(B) and 40 CFR Part 64]

- g) Miscellaneous Requirements
 - (1) None.

23. P902, Continuous Caster

Operations, Property and/or Equipment Description:

BOF Continuous molten steel slab casting operation

- 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
<i>BOF continuous casting hot metal transfer to tundish</i>		
a.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a.
<i>BOF continuous casting – casting machine</i>		
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stacks associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-11(B)	Particulate emissions from all stacks associated with this emissions unit shall not exceed 73.0 pounds per hour. See b)(2)b.
<i>BOF continuous casting – torch cutting operation</i>		
e.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
f.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a.

(2) Additional Terms and Conditions

a. In accordance with the permittee's permit application, the permittee has committed to the following control measures for the continuous casting operations:

- i. Maintain good operating practices for the hot metal transfer to the tundish at the inlet of the caster, in order to minimize or eliminate visible emissions of fugitive dust; and
- ii. Maintain good operating practices for torch cutting in order to minimize or eliminate visible emissions of fugitive dust.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The particulate emissions limitation of 73.0 pounds per hour is based upon a process weight rate of 700 tons per hour and Table I of OAC rule 3745-17-11. If the emission testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II of OAC rule 3745-17-11 is more stringent than 73.0 lbs/hour, the permittee shall comply with the more stringent limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

- a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

- (2) 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 the fugitive egress points for this emissions unit. The presence or absence of any visible fugitive 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 location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

e) Reporting Requirements

(1) The permittee shall submit semiannual reports that identify all of the following:

- a. all days during which any visible particulate emissions were observed from the stacks serving this emissions unit;
- b. all days during which any visible emissions of fugitive dust were observed at the fugitive egress points for this emissions unit; and
- c. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from the stacks associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

b. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The visible emission observations shall be performed at the appropriate non-stack egress points from this emissions unit.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

c. Emission Limitation:

Particulate emissions from all stacks associated with this emissions unit shall not exceed 73.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10). See f)(2) below.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(B)]

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

a. The emission testing shall be conducted within 12 months of expiration of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for particulates and for compliance with the stack visible particulate emission limitation.

c. The following test method(s) shall be employed:

Methods 1 through 5 and Method 9 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-11(B)]

- g) Miscellaneous Requirements
 - (1) None.



24. P925, No. 3 Blast Furnace

Operations, Property and/or Equipment Description:

740 tons per hour Blast Furnace, equipped with a casthouse baghouse, a settling chamber/dustcatcher (cyclone) and wet venturi scrubber system (Bischoff), and a blast furnace gas flare.

- 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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-11(B)	Particulate emissions from all stacks (stove stack, flare stack, bleeder valve stacks, and casthouse baghouse) associated with this emissions unit, combined, shall not exceed 73.8 pounds per hour. See b)(2)d.
c.	40 CFR Part 64 <i>Compliance Assurance Monitoring (CAM)</i>	See b)(2)e., d)(6-d)(10), e)(4-e)(5), and f)(4).
Blast Furnace Casthouse		
d.	OAC rule 3745-17-07(B)(3)	The visible particulate emission limitation for the blast furnace casthouse specified in this rule is equivalent to the limitation established pursuant to 40 CFR Part 63, Subpart FFFFF.
e.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The grain of particulate emissions per dry standard cubic foot limitation required by this rule is less stringent than the limitation established pursuant to 40 CFR Part 63, Subpart FFFFF.
f.	<p>40 CFR Part 63, Subpart FFFFF (40 CFR Part 63.7780-7852)</p> <p>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel Manufacturing Facilities</p> <p>[In accordance with 40 CFR 63.7782 (c) and (d), this emissions unit is the blast furnace casthouse at an existing integrated steel manufacturing facility subject to the emissions limitations and control measures specified in this section.]</p>	See b)(2)c. and c)(1).
g.	40 CFR Part 63, Subpart A (40 CFR 63.7850)	Table 4 to Subpart FFFFF of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart FFFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
<i>Non Casthouse Fugitive Emissions</i>		
h.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust (from all blast furnace activities other than casthouse operations) shall not exceed 20 percent opacity as a three-minute average.
i.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)b.

(2) Additional Terms and Conditions

- a. The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture and vent the particulate emissions from the blast furnace casthouse operation to baghouse P925BH01. The control equipment shall meet the following requirement:
 - i. the collection efficiency of the hooding and ventilation equipment associated with the blast furnace casthouse operation 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.

- b. The permittee shall employ reasonably available control measures on operations associated with this emissions unit for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall maintain a building enclosure, or employ water sprays or steam injection for the dry flue dust when it is discharged from the settling chamber/dustcatcher into a truck and/or rail car to minimize or eliminate visible emissions of fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. Pursuant to Table 1 of Subpart FFFFF of 40 CFR Part 63, the permittee shall comply with the following limitations for this emissions unit:
 - i. Any gases that exit a control device shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases (particulate emissions from the casthouse are vented to baghouse P925BH01); and
 - ii. Any secondary emissions that exit any opening in the casthouse or structure housing the blast furnace, shall not exhibit opacity greater than 20 percent opacity based upon a six-minute average.
- d. The particulate emission limitation of 73.8 pounds per hour is based upon a maximum process weight rate of 740 tons per hour and Table I of OAC rule 3745-17-11. This emission limitation is more stringent than that obtained from applying the uncontrolled particulate emission rate of 15,000 lbs/hr and Figure II of OAC rule 3745-17-11.
- e. At all times, the permittee shall maintain P925SC01 differential pressure and water flow monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7]

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7790(b)	Capture system and control device requirements.
63.7800(a)	General duty to minimize emissions.
63.7800(b)	Operation and maintenance plan for each capture system and control device.
63.7810(c)	Startup, shutdown, and malfunction plan.

63.7824(a) and (c)	Site-specific operating limit procedures
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[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart FFFFF]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from non casthouse fugitive operations. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stove stacks associated with this emissions unit. The presence or absence of any visible

emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

- (3) The permittee shall operate and maintain a thermocouple monitor and alarm system to detect the presence of the pilot flame on the waste gas flare. The permittee shall continuously record the thermocouple readings to indicate the presence of the pilot flame.

The permittee shall operate and maintain equipment to continuously monitor the position of the waste gas bleeder valve. The permittee shall continuously record the valve position to indicate whether the valve is open or closed (i.e. whether blast furnace gas is venting to the flare).

The permittee shall operate the flare at all times when the emissions unit is in operation and blast furnace gas is vented to it (i.e., a waste gas bleeder valve was open).

The thermocouple/alarm system and the valve position monitor shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

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

- (4) Whenever the monitoring conducted in d)(3) indicates that the pilot flame for the waste gas flare is not lit and a waste gas bleeder valve was open, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:



Effective Date: To be entered upon final issuance

- 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 operation of the control equipment within the acceptable conditions 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 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 thermocouple readings and/or valve position 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.

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

- (5) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7830(a), 63.7831(e)	Capture system monitoring requirements
63.7830(b)	Baghouse monitoring and inspection requirements
63.7831(a)-(e)	Site-specific monitoring plan and continuous parameter monitoring system (CPMS) requirements
63.7831(f)	Bag leak detection system requirements

63.7832(a)-(b)	Continuous monitoring and data collection requirements
63.7833(a), Table 3 of Subpart FFFFF	Continuous compliance demonstration requirements for emission limits
63.7833(b)	Continuous compliance demonstration requirements for each capture system
63.7833(c)	Continuous compliance demonstration requirements for each baghouse
63.7834(a)-(b)	Continuous compliance demonstration requirements for operation and maintenance requirements
63.7842(a), (c) and (d)	Required overall records to be maintained
63.7843(a)-(c)	Format and retention of records

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (6) The CAM plan for this emissions unit (Bischoff scrubber P925SC01) has been developed for particulate emissions. The CAM performance indicators for particulate emissions are the pressure drop across the venturi elements, the water flow at the pre-scrubber, and the water flow at the RS scrubber.

Scrubber P925SC01 operating parameters (pressure drop and water flows) are measured and recorded by continuous monitoring equipment and the associated record keeping requirements in d)(8). The indicator ranges for these parameters are specified in d)(7). When the monitored values for the operating parameters outside of their respective ranges, corrective action (including, but not limited to, an evaluation of the emissions unit and scrubber) will be required.

Upon detecting an excursion of the scrubber operating parameters, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range(s).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7]

- (7) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable ranges established for scrubber P925SC01 are as follows:
- a. The pressure drop across the scrubber shall be maintained at or above a minimum of 50 inches of water;
 - b. The pre-scrubber water flow rate shall be maintained at or above a minimum of 1,867 gallons per minute; and
 - c. The RS scrubber water flow rate shall be maintained at or above a minimum of 661 gallons per minute.

This range is 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 ranges based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the ranges 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 64.3]

- (8) The permittee shall properly operate and maintain equipment to continuously monitor the operating parameters in d)(7) associated with scrubber P925SC01 when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record once per shift the scrubber pressure drop and water flow rates. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored values for pressure drop and/or water flow varies from the ranges established in accordance with d)(7) of this permit, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the excursion was first observed;
- b. the magnitude of the excursion 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 an excursion, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range 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 excursion 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 corrective action was completed;
- h. the date and time the excursion ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the pressure drop and/or water flow readings 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.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.9]

- (9) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the 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, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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 64.7]

- (10) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8]

e) Reporting Requirements

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



Effective Date: To be entered upon final issuance

- a. each period of time (start time and date, and end time and date) when the pilot flame for the waste gas flare is not lit and a waste gas bleeder valve was open, and the cause of each incident;
- b. the corrective action(s) taken for each incident described in (a);
- c. an identification of each incident described in (a) where a prompt investigation was not conducted;
- d. an identification of each incident described in (a) where prompt corrective action, that would bring the emissions unit into compliance was determined to be necessary and was not taken; and
- e. an identification of each incident described in (a) where proper records were not maintained for the investigation and/or the corrective action(s).

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)]

- (2) The permittee shall submit semiannual reports that identify all of the following:
 - a. all days during which any visible particulate emissions were observed from the stove stacks associated with this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed during the non casthouse fugitive operations associated with this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (3) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7835(a)	Deviation reporting
63.7840(a)	Overall notification reporting requirements
63.7840(d)	Notification of intent to test
63.7840(e)	Notification of compliance status
63.7841(a)	Compliance report due dates



63.7841(b)	Compliance report contents
63.7841(c)	Immediate startup, shutdown, and malfunction reports
63.7841(d)	Title V monitoring report allowance

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (4) The permittee shall submit quarterly excursion reports that identify the following:
- a. each period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber P925SC01;
 - b. each period of time (start time and date, and end time and date) when the pressure drop and/or water flow rates were outside of the ranges specified in d)(7) and the cause of each incident;
 - c. the date, time, and duration of any downtime of the scrubber continuous monitoring equipment (other than downtime associated with QA/QC or other calibration checks) while the emissions unit was in operation and the cause of each incident;
 - d. the corrective action(s) taken for each incident described in (a) and (b);
 - e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;
 - f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring the emissions unit into compliance and/or the scrubber pressure drop and/or water flow indicator ranges defined in d)(7) into an acceptable range, was determined to be necessary and was not taken; and
 - g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

The quarterly 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 64.9]

- (5) If the permittee is required under 40 CFR Part 64.8 and d)(10) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

b. Emission Limitation:

Visible particulate emissions of fugitive dust (from all blast furnace activities other than casthouse operations) shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The visible emission observations shall be performed at the appropriate non-stack egress points from this emissions unit.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

c. Emission Limitation:

Particulate emissions from all stacks associated with this emissions unit, combined, shall not exceed 73.8 pounds per hour.



Applicable Compliance Method:

Compliance shall be determined through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10). See f)(4) below.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(B), and OAC rule 3745-17-03(B)(10)]

d. Emission Limitation:

Any gases that exit a control device shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases (particulate emissions from the casthouse are vented to baghouse P925BH01).

Applicable Compliance Method:

The actual emission rate shall be calculated from the results of the most recent stack test which demonstrated compliance. The permittee shall conduct emission testing in accordance with the requirements of 40 CFR Part 63, Subpart FFFFF. See f)(2) and f)(3). Pursuant to Subpart FFFFF, the permittee must conduct performance tests no less frequently than once during the term of this Title V permit for baghouse emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

e. Emission Limitation:

Any secondary emissions that exit any opening in the casthouse or structure housing the blast furnace, shall not exhibit opacity greater than 20 percent opacity based upon a six-minute average.

Applicable Compliance Method:

The permittee shall conduct performance tests to demonstrate compliance with the opacity limitation in accordance with the requirements of 40 CFR Part 63, Subpart FFFFF. See f)(2) and f)(3).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (2) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:



63.7810(a)	General compliance requirements
63.7820(a)-(b)	Initial performance tests and compliance requirements
63.7821(a) and (c)	Subsequent performance tests [see f)(1)d. above]
63.7822(a), (b) and (e)	Performance test requirements and test methods
63.7823(a)-(c)	Performance test requirements and test methods for opacity
63.7825(a) and (c)	Initial compliance demonstrations with emission limitations
63.7826(a)-(b)	Initial compliance demonstrations with operation and maintenance
63.7835(b)	Startups, shutdowns, and malfunctions

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

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

- a. The emission testing on the casthouse baghouse P925BH01 shall be conducted between 12 and 24 months of the effective date of this permit.
- b. The emission testing shall be conducted at the outlet of P925BH01 (baghouse control device) to demonstrate compliance with the allowable mass emission limitation for particulates of 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases.
- c. The emission testing conducted in a. above shall include visible emission observations of any opening in the casthouse or structure housing the blast furnace to demonstrate compliance with the opacity limitation on secondary emissions in b)(2)c.ii.
- d. The test method(s) and procedures outlined in 40 CFR 63.7822 and 63.7823 shall be employed to demonstrate compliance with the allowable mass emission rate and opacity limitation.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.

- f. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
- g. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (4) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing on the settling chamber/dustcatcher (cyclone) and wet venturi scrubber system (Bischoff) P925SC01 and stove stack shall be conducted between 24 and 36 months of the effective date of this permit.
 - b. The emission testing shall be conducted at the outlet of P925SC01 (scrubber control device) and the stove stack to demonstrate compliance with the allowable mass emission limitation of 73.8 pounds per hour.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Method 1 through 5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.
 - d. The scrubber pressure drop and water flow rate operating parameters specified in d)(7) shall be recorded at 5-minute intervals during the emission testing.

- e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.
- f. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
- g. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

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

- g) Miscellaneous Requirements
 - (1) None.

25. P934, CAS/OB

Operations, Property and/or Equipment Description:

Steel refining station, equipped with a snorkel capture hood and baghouse, using argon stirring and oxygen blowing for certain steel grades.

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 14-1663, issued March 8, 1989)	<p>PE shall not exceed 1.92 pounds per hour and 9.1 TPY.</p> <p>PE shall not exceed 0.02 grain/dscf from the outlet of the baghouse(s) serving this emissions unit.</p> <p>The hourly PE limitation and grains/dscf PE limitation specified by this rule are less stringent than the emission limitation established pursuant to 40 CFR Part 63, Subpart FFFFF. The permittee shall comply with all applicable emission limitations (including any less stringent emission limitation) for this emissions unit.</p> <p>CO emissions shall not exceed 100 pounds per day* and 20 TPY*.</p> <p>*These emission limitations represent the emissions unit's potential to emit. Therefore, no additional monitoring, recordkeeping, or reporting requirements are necessary to demonstrate compliance with these emission limitations.</p> <p>See b)(2)a. through b)(2)c.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-08(B)(3).
b.	OAC rule 3745-17-07(A)(1)	The visible emission limitations specified by this rule are less stringent than the limitations established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(B)(1)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-08(B)(3)	The control requirements for fugitive dust specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(B)(1)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	<p>40 CFR Part 63, Subpart FFFFF (40 CFR Part 63.7780-7852)</p> <p>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel Manufacturing Facilities</p> <p>[In accordance with 40 CFR 63.7782 (c), this emissions unit is a shop ancillary operation of an existing basic oxygen process furnace (BOPF) shop located at an integrated steel manufacturing facility subject to the emissions limitations and control measures specified in this section.]</p>	See b)(2)d. and c)(1).
g.	40 CFR Part 63, Subpart A (40 CFR 63.7850)	Table 4 to Subpart FFFFF of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart FFFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The snorkel hood shall have a design capture efficiency of at least 95% for control of particulate emissions.
- b. Visible particulate emissions from the baghouse outlet (P934/5BH01) shall not exceed 5 percent opacity as a six-minute average.
- c. Visible particulate emissions of fugitive dust from the vacuum degas building shall not exceed 6 percent opacity as a six-minute average.
- d. Pursuant to Table 1 of Subpart FFFFF of 40 CFR Part 63, the baghouse(s) shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7800(a)	General duty to minimize emissions.
63.7810(c)	Startup, shutdown, and malfunction plan.

Note: the capture and control device for particulate emissions from this ancillary emissions unit is baghouse P934/5BH01.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart FFFFF]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7830(b)	Baghouse monitoring and inspection requirements
63.7831(a)-(d)	Site-specific monitoring plan and continuous parameter monitoring system (CPMS) requirements
63.7831(f)	Bag leak detection system requirements
63.7832(a)-(b)	Continuous monitoring and data collection requirements
63.7833(a), Table 3 of Subpart FFFFF	Continuous compliance demonstration requirements for emission limits
63.7833(c)	Continuous compliance demonstration requirements for each baghouse



Effective Date: To be entered upon final issuance

63.7842(a), (c), and (d)	Required overall records to be maintained
63.7843(a)-(c)	Format and retention of records

Note: the capture and control device for particulate emissions from this ancillary emissions unit is baghouse P934/5BH01.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (2) The permittee shall maintain daily records listing the length of time that alloy charging and oxygen blowing occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-1663, issued on March 8, 1989:d(1) - d(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7835(a)	Deviation reporting
63.7840(a)	Overall notification reporting requirements
63.7840(d)	Notification of intent to test
63.7840(e)	Notification of compliance status
63.7841(a)	Compliance report due dates
63.7841(b)	Compliance report contents
63.7841(c)	Immediate startup, shutdown, and malfunction reports
63.7841(d)	Title V monitoring report allowance

Note: the capture and control device for particulate emissions from this ancillary emissions unit is baghouse P934/5BH01.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (2) 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 #14-1663, issued on March 8, 1989:e)(1). 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 compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions of fugitive dust from the vacuum degas building shall not exceed 6 percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

Visible PE observations shall be made at egress points of the building housing the CAS/OB.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

b. Emission Limitation:

Visible particulate emissions from the baghouse (P934/5BH01) associated with this emissions unit shall not exceed 5 percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]



c. Emission Limitation:

The baghouse(s) shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

The actual emission rate shall be calculated from the results of the most recent stack test which demonstrated compliance*. The permittee shall conduct emission testing in accordance with the requirements of 40 CFR Part 63, Subpart FFFFF. See f)(2) and f)(3).

*NOTE: baghouse P934/5BH01 is the primary control device for this emissions unit. Pursuant to Subpart FFFFF, the permittee must conduct performance tests no less frequently than once during the term of this Title V permit for the baghouse serving this emissions unit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

d. Emission Limitation:

PE shall not exceed 1.92 pounds per hour and 9.1 TPY.

Applicable Compliance Method:

The hourly particulate emissions are based upon the emission calculations provided by AK Steel in permit to install application 14-1663 submitted on October 3, 1988.

The annual emissions are based upon the emission calculations provided by AK Steel in permit to install application 14-1663 submitted on October 3, 1988.

If required, compliance shall be determined through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

e. Emission Limitation:

CO emissions shall not exceed 100 pounds per day and 20 TPY.

Applicable Compliance Method:

The hourly CO emissions are based upon the emission calculations provided by AK Steel in permit to install application 14-1663 submitted on October 3, 1988.

The annual emissions shall be determined by multiplying the hourly emissions by 8760 hours per year then dividing by 2000 pounds per ton and rounding up to 20 TPY.



If required, compliance shall be determined through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10 to determine the hourly emission rate and the result multiplied by the daily hours of operation.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (2) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7810(a)	General compliance requirements
63.7820(a)	Initial performance tests and compliance requirements
63.7821(a) and (c)	Subsequent performance tests [see f)(1)c. above]
63.7822(a), (b), and (h)	Performance test requirements and test methods
63.7825(a) and (c)	Initial compliance demonstrations with emission limitations
63.7835(b)	Startups, shutdowns, and malfunctions

Note: the capture and control device for particulate emissions from this ancillary emissions unit is baghouse P934/5BH01.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

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

- a. The emission testing shall be conducted within 12 months of the effective date of this permit.
- b. The emission testing shall be conducted at the outlet of P934/5BH01 (baghouse control device) to demonstrate compliance with the allowable mass emission limitation for particulates of 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases. During each test run, visible emission observations shall be performed to demonstrate compliance with the opacity limitations for the degas building and the baghouse exhaust.
- c. The test method(s) and procedures outlined in 40 CFR 63.7822 shall be employed to demonstrate compliance with the allowable mass emission rate. The visible emission observations shall be conducted in accordance with USEPA Method 9.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable

emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
- f. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and 40 CFR Part 63, Subpart FFFFF]

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-1663, issued on March 8, 1989:f(1) – f(3). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) None.

26. P935, Vacuum Degasser

Operations, Property and/or Equipment Description:

Vacuum degassing system is a molten steel refining station for certain steel grades, equipped with condensers and a shared baghouse P934/5BH01

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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)b. and b)(2)c.
d.	OAC rule 3745-17-11(B)	Particulate emissions from all stacks associated with this emissions unit shall not exceed 73.1 pounds per hour. See b)(2)a.

(2) Additional Terms and Conditions

a. The particulate emissions limitation of 73.1 pounds per hour is based upon a process weight rate of 700 tons per hour and Table I of OAC rule 3745-17-11. If emissions testing conducted on this emissions unit demonstrates that the allowable emissions rate from Figure II of OAC rule 3745-17-11 is more stringent than 73.1 lbs/hour, the permittee shall comply with the more stringent limitation.

- b. The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture and vent the particulate emissions from the vacuum degassing operation to baghouse P934/5BH01. The control equipment shall meet the following requirement:
 - i. The collection efficiency of the hooding and ventilation equipment associated with the molten steel degassing operation 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.
 - ii. The control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases.
- c. The permittee shall use partial enclosures for the additive handling operation to minimize or eliminate visible emissions of fugitive dust. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse (P934/5BH01) exhaust stack serving this emissions unit.

The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-08(B)]

- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the fugitive egress points for this emissions unit. The presence or absence of any visible fugitive 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 location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]



- (3) Additional parametric monitoring is not needed for baghouse (P934/5BH01) since emissions unit P934 vents to this baghouse and has parametric monitoring required by 40 CFR Part 63, Subpart FFFFF.

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

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports that identify all of the following:
 - a. all days during which any visible particulate emissions were observed from the baghouse stack associated with this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed at the fugitive egress points for this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

f) Testing Requirements

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

- a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

- b. Emission Limitation:



Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The visible emission observations shall be performed at the appropriate non-stack egress points from this emissions unit.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

c. Emission Limitation:

Particulate emissions from all stacks associated with this emissions unit shall not exceed 73.1 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed on the condenser stacks and baghouse stack associated with this emissions unit using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3744-77-07(C)(1), OAC rule 3745-17-03, and OAC rule 3745-17-11]

d. Emission Limitation:

The control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Methods:

The actual emission rate shall be calculated from the results of the most recent stack test which demonstrated compliance. Baghouse P934/5BH01 controls particulate emissions from emissions units P934 and P935. Emissions unit P934 is subject to a more stringent requirement (0.01 grain PE/dscf) than the emission limitation above. The emission testing required for emissions unit P934 may be used to determine compliance with the limitation above. See the terms for emissions unit P934 for the performance test requirement.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B)]



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) Vacuum degassing is not included in ladle metallurgy per the definitions outlined in 40 CFR 63.7852; therefore it is not an ancillary operation of the BOPF shop subject to the requirements of 40 CFR Part 63, Subpart FFFFF.

27. P956, Desulfurization Station

Operations, Property and/or Equipment Description:

Hot metal pouring and desulfurization (spare station), equipped with baghouse.

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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)(3)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a. The grain of particulate emissions per dry standard cubic foot limitation required by this rule is less stringent than the limitation established pursuant to 40 CFR Part 63, Subpart FFFFF.
d.	OAC rule 3745-17-11	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 63, Subpart FFFFF.
e.	OAC rule 3745-18-15(C)(9)	Sulfur dioxide emissions shall not exceed 0.29 pound of sulfur dioxide per ton of product from the station. This emissions unit shall not be operated when emissions unit P047 is in operation. See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	<p>40 CFR Part 63, Subpart FFFFF (40 CFR Part 63.7780-7852)</p> <p>National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel Manufacturing Facilities</p> <p>[In accordance with 40 CFR 63.7782 (c), this emissions unit is a shop ancillary operation of an existing basic oxygen process furnace (BOPF) shop located at an integrated steel manufacturing facility subject to the emissions limitations and control measures specified in this section.]</p>	See b)(2)c. and c)(1).
g.	40 CFR Part 63, Subpart A (40 CFR 63.7850)	Table 4 to Subpart FFFFF of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart FFFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
h.	OAC rule 3745-31-05(A)(3) (PTI 18-055, issued October 31, 1977)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust from the hot metal pouring and desulfurization process. The control equipment associated with the hot metal pouring and desulfurization process shall meet the following requirements:
 - i. 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.
- b. Based on information provided in AP-42, Fifth Edition, Section 12.5.2.3, Emissions and Controls for hot metal desulfurization, and emission information provided by AK Steel, the potential to emit for sulfur dioxide emissions from this emissions unit is well below the allowable emission rate; therefore, it is not necessary to establish monitoring, record keeping, and reporting requirements to ensure ongoing compliance. AP-42 lists no SO₂ emissions from the hot metal desulfurization process, and the permittee estimates 1.5 lbs/hr SO₂, at maximum production levels. This equates to a maximum emission rate well below the allowable SO₂ emission limit listed in b)(1) of this permit.



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- c. Pursuant to Table 1 of Subpart FFFFF of 40 CFR Part 63, the baghouse shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases. Particulate emissions from this emissions unit are vented to baghouse P956/BH01.
- d. No applicable emission limitations or control measures were established for this emissions unit in PTI 18-055.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7800(a)	General duty to minimize emissions.
63.7810(c)	Startup, shutdown, and malfunction plan.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart FFFFF]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain a record of all times this emissions unit was in operation concurrently with emissions unit P047.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-15(C)]

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7830(b)	Baghouse monitoring and inspection requirements
63.7831(a)-(d)	Site-specific monitoring plan and continuous parameter monitoring system (CPMS) requirements
63.7831(f)	Bag leak detection system requirements
63.7832(a)-(b)	Continuous monitoring and data collection requirements
63.7833(a), Table 3 of Subpart FFFFF	Continuous compliance demonstration requirements for emission limits
63.7833(c)	Continuous compliance demonstration requirements for each baghouse
63.7842(a), (c), and (d)	Required overall records to be maintained

63.7843(a)-(c)	Format and retention of records
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[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #18-055, issued on October 31, 1977:d)(1) - d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any time periods when emissions units P956 and P047 were in operation at the same time.

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 OAC rule 3745-18-15(C)]

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7835(a)	Deviation reporting
63.7840(a)	Overall notification reporting requirements
63.7840(d)	Notification of intent to test
63.7840(e)	Notification of compliance status
63.7841(a)	Compliance report due dates
63.7841(b)	Compliance report contents
63.7841(c)	Immediate startup, shutdown, and malfunction reports
63.7841(d)	Title V monitoring report allowance

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (3) 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 #18-055, issued on October 31, 1977:e)(1) - 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 compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

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

a. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The points of observation for visible emission observations shall include any non-stack egress points from the BOF building housing this emissions unit. Such egress points shall include, but are not limited to: doorways, windows, and roof monitors.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]



c. Emission Limitation:

Sulfur dioxide emissions shall not exceed 0.29 pound of sulfur dioxide per ton of product from the station.

Applicable Compliance Method:

If required, compliance shall be determined through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 and the procedures specified in OAC rule 3745-18-04.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-15(C), and OAC rule 3745-18-04]

d. Emission Limitation:

The baghouse shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

The actual emission rate shall be calculated from the results of the most recent stack test which demonstrated compliance*. The permittee shall conduct emission testing in accordance with the requirements of 40 CFR Part 63, Subpart FFFFF. See f)(2) and f)(3).

*NOTE: baghouse P956BH01 controls particulate emissions from this emissions unit. Pursuant to Subpart FFFFF, the permittee must conduct performance tests no less frequently than once during the term of this Title V permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (2) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7810(a)	General compliance requirements
63.7820(a)	Initial performance tests and compliance requirements
63.7821(a) and (c)	Subsequent performance tests [see f)(1)d. above]
63.7822(a), (b), and (h)	Performance test requirements and test methods
63.7825(a) and (c)	Initial compliance demonstrations with emission limitations
63.7835(b)	Startups, shutdowns, and malfunctions

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (3) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within six months of first operation of this emission unit.
 - b. The emission testing shall be conducted at the outlet of P956BH01 (baghouse control device) to demonstrate compliance with the allowable mass emission limitation for particulates of 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases.
 - c. The test method(s) and procedures outlined in 40 CFR 63.7822 shall be employed to demonstrate compliance with the allowable mass emission rate.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
- f. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written



report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #18-055, issued on October 31, 1977:f)(1) – f)(3). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

- g) Miscellaneous Requirements
 - (1) None.



28. T021, Tar Storage Tank

Operations, Property and/or Equipment Description:

330,000 gallon Tar Storage Tank, equipped with gas blanketing

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 P0111263, issued October 10, 2012)	VOC emissions shall not exceed 4.39 tons per year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-21-09(L)	Exempt. See b)(2)c. and c)(2).
d.	40 CFR Part 61, Subpart L [40 CFR 61.130-139] National Emission Standards for Benzene Emissions from Coke By-Product Recovery Plants [In accordance with 40 CFR 61.130 and 61.131, this emissions unit consists of a tar storage tank subject to the emissions standards and requirements specified in this section.]	See b)(2)d. and c)(1).
e.	40 CFR Part 61, Subpart V [40 CFR 61.240-247] National Emission Standard for Equipment Leaks (Fugitive Emissions Sources)	Test methods and procedures in 61.245(d) as specified in Subpart L. [40 CFR 61.137(a) and (b)] See b)(2)d. and b)(2)e.
f.	40 CFR Part 61, Subpart FF [40 CFR 61.340-359]	See b)(2)f.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	National Emission Standard for Benzene Waste Operations	

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then 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 volatile organic compound (VOC) emissions from this air contaminant source because the calculated annual emission rate for VOC is less than ten tons per year taking into account the federally enforceable requirements under 40 CFR Part 61, Subpart L.

c. OAC rule 3745-21-09(L) does not apply to the VOC emissions from this air contaminant source since tar is the only material stored in this tank and the true vapor pressure of tar is less than 1.52 pounds per square inch absolute.

d. The permittee shall operate and maintain a gas blanketing system for the by-products recovery plant in accordance with the requirements of 40 CFR 61.132. Pursuant to 40 CFR 61.132(a) of Subpart L, the permittee shall duct gases from the tar storage tank and tar-intercepting sump to the gas collection system, gas distribution system, or other enclosed point in the by-product recovery process where the benzene in the gas will be recovered or destroyed. This control system shall be designed and operated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determined by the methods specified in 40 CFR 61.245(c) of Subpart V. This system can be designed as a closed, positive pressure, gas blanketing system.

i. Except, the permittee may elect to install, operate, and maintain a pressure relief device, vacuum relief device, an access hatch, and a



Effective Date: To be entered upon final issuance

sampling port on the tar storage tank and tar-intercepting sump. Each access hatch and sampling port must be equipped with a gasket and a cover, seal, or lid that must be kept in a closed position at all times, unless in actual use.

- e. The permittee has indicated that the ancillary equipment associated with this emissions unit is not “in benzene service” as defined in 40 CFR Part 61.131. Therefore, the leak detection and repair provisions specified in 61.135 of Subpart L and related provisions of Subpart V do not apply. In accordance with 40 CFR 61.137(b), the provisions of 61.245(d) in Subpart V shall be used to demonstrate the equipment is not in benzene service. See d)(2) below.
- f. As identified in the permittee’s Title V application, the total annual benzene quantity from facility waste is less than 10 megagrams (Mg) per year (11 tons per year), therefore the permittee is exempt from the general standards in 40 CFR 61.342(b) and (c) of Subpart FF pursuant to 40 CFR 61.342(a). See d)(3) below.

c) Operational Restrictions

- (1) The permittee shall enclose and seal all openings on the tar storage tank and tar-intercepting sump.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 61, Subpart L]

- (2) The permittee shall not store any material in this emissions unit that has a true vapor pressure greater than 1.52 pounds per square inch absolute.

[Authority for Term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-21-09(L)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V, including the following sections:

61.132(b); 61.245(c)	Monitoring and semiannual inspection requirements
61.132(c)	Annual maintenance inspection requirements
61.138(b)	Recordkeeping requirements for semiannual inspections and annual maintenance inspections
61.138(a)	Recordkeeping requirements for the design of control equipment installed
61.246(i)-(j)	Recordkeeping requirements for equipment not in VHAP service

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

- (2) The permittee shall maintain records in accordance with 40 CFR 61.246(i) that demonstrate that the ancillary equipment associated with this emissions unit is not “in benzene service” as defined in 40 CFR Part 61.131. As specified in 40 CFR 61.137(b), to determine whether or not a piece of equipment is in benzene service, the methods in 40 CFR 61.245(d) shall be used.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

- (3) The permittee shall maintain records of the calculated total annual benzene quantity from facility waste determined in accordance with 40 CFR 61.342(a) and the procedures specified in 40 CFR 61.355.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 61, Subpart FF]

- (4) For each day during which the permittee stores any material in this emissions unit that has a true vapor pressure greater than 1.52 pounds per square inch absolute, the permittee shall maintain records of the type and maximum true vapor pressure of the material stored in this emissions unit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(L)]

- (5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit # P0111263, issued on October 10, 2012:d(1) - d(4). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 61, Subparts L, V, and FF, including the following sections:

61.138(e) and (g); 61.247(a); 61.357(a) and (b)	Initial notification
61.138(f);	Semiannual reporting requirements
61.357(b) and (c)	Reporting requirements for changes in operations affecting total annual benzene quantity from facility waste

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, 40 CFR Part 61, Subpart V, and 40 CFR Part 61, Subpart FF]

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a material was stored in the emissions unit with a true vapor pressure greater than 1.52

pounds per square inch absolute. Each report shall be submitted within 30 days after the deviation occurs.

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

- (3) 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 # P0111263, issued on October 10, 2012:e)(1) – 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 compliance with the underlying reporting requirements in the Permit to Install.

f) **Testing Requirements**

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

- a. **Emission Limitation:**

The control system shall be designed and operated for no detectable emissions pursuant to 40 CFR 61.132(b).

Applicable Compliance Method:

Compliance with 40 CFR Part 61, Subpart L shall be determined by a review of records, review of performance test results, inspections, or any combination thereof, using the methods and procedures specified in 40 CFR 61.137 and 61.245.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 61, Subpart L, and 40 CFR Part 61, Subpart V]

- b. **Emission Limitation:**

VOC emissions shall not exceed 4.39 tons per year.

Applicable Compliance Method:

Compliance with VOC emissions limitations shall be determined by using emissions factors from AP-42 Chapter 12.2, Table 12.2-23, May 2008, and 98% control efficiency for gas blanketing.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3)]

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit # P0111263, issued on October 10, 2012:f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

- (1) None.



29. Emissions Unit Group - Annealing: B021, B022, B023, and B026

EU ID	Operations, Property and/or Equipment Description
B021	118.6 MMBtu/hr indirect-fired natural gas batch annealing furnace - No. 84 Anneal
B022	80 MMBtu/hr indirect-fired natural gas batch annealing furnace - Open Coil Anneal
B023	244.2 MMBtu/hr indirect-fired natural gas batch annealing furnace - No. 64 Anneal
B026	145.8 MMBtu/hr indirect-fired natural gas batch annealing furnace - No. 94 Anneal

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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per MMBtu actual heat input.
c.	OAC rule 3745-18-15(C)(6)	Sulfur dioxide emissions shall not exceed 0.50 pound per MMBtu actual heat input for emissions units B021, B022, and B023.
d.	OAC rule 3745-18-15(C)(7)	Sulfur dioxide emissions shall not exceed 1.6 pounds per MMBtu actual heat input for emissions unit B026.
e.	40 CFR Part 63, Subpart DDDDD [40 CFR 63.7480-7575] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters [In accordance with 40 CFR 63.7499 and 63.7575, these emissions units include an existing process heater	Table 3 to 40 CFR Part 63, Subpart DDDDD – Work Practice Standards [40 CFR 63.7500]. See c)(2). Pursuant to 40 CFR 63.7495(b), the permittee shall comply with this subpart no later than January 31, 2016, except as provided in 63.6(i).



Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(metal process furnace) designed to burn gas 1 subcategory fuel subject to the work practices specified in this section.]	
f.	40 CFR Part 63, Subpart A (40 CFR 63.7565)	Table 10 to 40 CFR Part 63, Subpart DDDDD – Applicability of General Provisions (Subpart A) to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

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

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

(2) The permittee shall comply with the applicable work practices required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7500(a)(1), (b), (e), and (f); 63.7515(d), 63.7540(a)(10) and (a)(13); and Table 3 to Subpart DDDDD	annual tune-up requirements
63.7500(a)(1), (b), (e), and (f); and Table 3 to Subpart DDDDD	one-time energy assessment requirements
63.7500(a)(3)	general duty to minimize emissions

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart DDDDD]

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 the emissions unit.

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

- (2) Monitoring and record keeping for the sulfur content is not required for natural gas because the sulfur dioxide emission rate from the burning of natural gas is less than the allowable sulfur dioxide emission rates in b)(1) of these terms and conditions.

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

- (3) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7555(a)(1), (h), (i), and (j)	required overall records to be maintained
63.7560	record format and retention requirements

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify each day when a fuel other than natural gas was burned in the emissions unit.

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)]

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7530(d), (e), and (f); 63.7545(a), (b), (e), (f), and (h)	Notification of Compliance Status requirements
63.7550(a) – (c) and (h); and Table 9 to Subpart DDDDD	content and submission of compliance reports

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

f) Testing Requirements

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



a. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)]

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per MMBtu actual heat input.

Applicable Compliance Method:

To determine the actual particulate emission rate for natural gas, the following equation may be used:

$$E \text{ (lb/MMBtu)} = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1000 \text{ Btu}) \times (1,000,000 \text{ Btu/MMBtu}) = 0.0019 \text{ lb/MMBtu}$$

Where: E = particulate emission rate from natural gas, in lb/MMBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate matter from burning natural gas, from AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1000 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/MMBtu = conversion from Btu to MMBtu.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B)]

c. Emission Limitation:

Sulfur dioxide emissions shall not exceed 0.50 pound per MMBtu actual heat input for emissions units B021, B022, and B023.



Applicable Compliance Method:

For the combustion of natural gas, pursuant to OAC rule 3745-18-04(F)(4), the SO₂ emission rate for the emissions unit shall be considered to be equal to 0.0 pound per MMBtu.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6C and the procedures in OAC rule 3745-18-04.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-15(C)]

d. Emission Limitation:

Sulfur dioxide emissions shall not exceed 1.6 pounds per MMBtu actual heat input for emissions unit B026.

Applicable Compliance Method:

For the combustion of natural gas, pursuant to OAC rule 3745-18-04(F)(4), the SO₂ emission rate for the emissions unit shall be considered to be equal to 0.0 pound per MMBtu.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6C and the procedures in OAC rule 3745-18-04.

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-15(C)]

g) Miscellaneous Requirements

- (1) None.

30. Emissions Unit Group - Basic Oxygen Furnace Vessels: P926 and P927

EU ID	Operations, Property and/or Equipment Description
P926	The No. 15 basic oxygen furnace, including charging, refining, tapping, and slagging operations, equipped with closed hood and venturi scrubber and flare
P927	The No. 16 basic oxygen furnace including charging, refining, tapping, and slagging operations, equipped with closed hood and venturi scrubber and flare

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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a. The grain of particulate emissions per dry standard cubic foot limitation required by this rule is less stringent than the limitation established pursuant to 40 CFR Part 63, Subpart FFFFF.
d.	OAC rule 3745-17-11(B)	Particulate emissions from all stacks (scrubber and baghouse) associated with each emissions unit shall not exceed 71.8 pounds per hour. See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 63, Subpart FFFFF (40 CFR Part 63.7780-7852) National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel Manufacturing Facilities [In accordance with 40 CFR 63.7782 (c), this emissions unit is a basic oxygen process furnace of an existing BOPF shop located at an integrated steel manufacturing facility subject to the emissions limitations and control measures specified in this section.]	See b)(2)c. and c)(1).
f.	40 CFR Part 63, Subpart A (40 CFR 63.7850)	Table 4 to Subpart FFFFF of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart FFFFF shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture and vent the particulate emissions from the basic oxygen process furnace shop to baghouse P926/7BH01. The control equipment shall meet the following requirement:
 - i. the collection efficiency of the hooding and ventilation equipment associated with the basic oxygen process furnace shop 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.
- b. The particulate emission limitation of 71.8 pounds per hour is based upon a maximum process weight of 630 TPH and Table I of OAC rule 3745-17-11. This emission limitation is more stringent than that obtained from applying the uncontrolled particulate emission rate of 14,535 lbs/hr and Figure II of OAC rule 3745-17-11. The allowable particulate emissions using Figure II is 91.7 lbs/hr. The uncontrolled mass rate of emission was calculated using the maximum process weight rate of 510 tons per hour (the individual maximum process weight rates for each emissions units P926 or P927 per OAC rule 3745-17-11(A)(3)) provided in the permit application and an emission factor of 28.5 pounds per ton for uncontrolled basic oxygen furnace (BOF) particulate emissions from AP-42, Table 12.5-1 (10/86).

- c. Pursuant to Table 1 of Subpart FFFFF of 40 CFR Part 63, the permittee shall comply with the following limitations for this emissions unit:
 - i. The permittee shall not discharge to the atmosphere any gases that exit from a primary emission control system for a BOPF with a closed hood system that contain, on a flow-weighted basis, particulate matter in excess of 0.03 gr/dscf during the primary oxygen blow (primary particulate emissions from the BOPF are vented to scrubbers P926SC01 and P927SC01);
 - ii. Any gases that exit from a control device used solely for the collection of secondary emissions from the BOPF shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases (secondary particulate emissions from the BOPF are vented to baghouse P926/7BH01); and
 - iii. Any secondary emissions that exit any opening in the BOPF shop or any other building housing the BOPF or BOPF shop operation, shall not exhibit opacity greater than 20 percent opacity, as a three-minute average.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7790(b)	Capture system and control device requirements.
63.7800(a)	General duty to minimize emissions.
63.7800(b)	Operation and maintenance plan for each capture system and control device.
63.7810(c)	Startup, shutdown, and malfunction plan.
63.7824(a), (b), and (c)	Site-specific operating limit procedures

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart FFFFF]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate an alarm system to alert the BOF operator when the pilot flame for the flare is not lit when oxygen blows are occurring. The alarm system shall be maintained and operated in a manner consistent with manufacturer's recommendations and good operating practices. The permittee shall operate the flare at all times when the emissions unit is in operation and oxygen blows are occurring. The permittee shall record all periods of time that the pilot flame for the flare is not lit when oxygen blows are occurring.

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

- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7830(a), 63.7831(e)	Capture system monitoring requirements
63.7830(b)	Baghouse monitoring and inspection requirements
63.7830(c)	Scrubber monitoring requirements
63.7831(a)-(e)	Site-specific monitoring plan and continuous parameter monitoring system (CPMS) requirements
63.7831(f)	Bag leak detection system requirements
63.7831(g)	Scrubber CPMS requirements
63.7832(a)-(b)	Continuous monitoring and data collection requirements
63.7833(a), Table 3 of Subpart FFFFF	Continuous compliance demonstration requirements for emission limits
63.7833(b)	Continuous compliance demonstration requirements for each capture system
63.7833(c)	Continuous compliance demonstration requirements for each baghouse
63.7833(d) and (g)	Continuous compliance demonstration requirements for each scrubber
63.7834(a)-(b)	Continuous compliance demonstration requirements for operation and maintenance requirements
63.7842(a), (c), and (d)	Required overall records to be maintained
63.7843(a)-(c)	Format and retention of records

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when the pilot flame for the flare was not lit when oxygen blows were occurring.

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

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

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7835(a)	Deviation reporting
63.7840(a)	Overall notification reporting requirements
63.7840(d)	Notification of intent to test
63.7840(e)	Notification of compliance status
63.7841(a)	Compliance report due dates
63.7841(b)	Compliance report contents
63.7841(c)	Immediate startup, shutdown, and malfunction reports
63.7841(d)	Title V monitoring report allowance

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The visible emission observations shall be performed at the appropriate non-stack egress points from the emissions unit.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).



[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

b. Emission Limitation:

Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)]

c. Emission Limitation:

Particulate emissions from all stacks (scrubber and baghouse) associated with each emissions unit shall not exceed 71.8 pounds per hour.

Applicable Compliance Method:

If required, compliance shall be determined through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(B), and OAC rule 3745-17-03(B)(10)]

d. Emission Limitation:

The permittee shall not discharge to the atmosphere any gases that exit from a primary emission control system for a BOPF with a closed hood system that contain, on a flow-weighted basis, particulate matter in excess of 0.03 gr/dscf during the primary oxygen blow (primary particulate emissions from the BOPF are vented to scrubbers P926SC01 and P927SC01).

Any gases that exit from a control device used solely for the collection of secondary emissions from the BOPF shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases (secondary particulate emissions from the BOPF are vented to baghouse P926/7BH01).

Applicable Compliance Method:



The actual emission rate shall be calculated from the results of the most recent stack test which demonstrated compliance. The permittee shall conduct emission testing in accordance with the requirements of 40 CFR Part 63, Subpart FFFFF. See f)(2) and f)(3). Pursuant to Subpart FFFFF, the permittee must conduct performance tests no less frequently than once during the term of this Title V permit for baghouse emissions and no less frequently than twice during the term of this Title V permit for scrubber emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

e. Emission Limitation:

Any secondary emissions that exit any opening in the BOPF shop or any other building housing the BOPF or BOPF shop operation, shall not exhibit opacity greater than 20 percent opacity, as a three-minute average.

Applicable Compliance Method:

The permittee shall conduct performance tests to demonstrate compliance with the opacity limitation in accordance with the requirements of 40 CFR Part 63, Subpart FFFFF. See f)(2) and f)(3).

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

(2) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart FFFFF, including the following sections:

63.7810(a)	General compliance requirements
63.7820(a)-(b)	Initial performance tests and compliance requirements
63.7821(a)-(c)	Subsequent performance tests [see f)(1)d. above]
63.7822(a), (b), (d), and (f).	Performance test requirements and test methods
63.7823(a)-(c)	Performance test requirements and test methods for opacity
63.7825(a)-(c)	Initial compliance demonstrations with emission limitations
63.7826(a)-(b)	Initial compliance demonstrations with operation and maintenance
63.7835(b)	Startups, Shutdowns, and Malfunctions

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

- (3) The permittee shall conduct, or have conducted, emission testing for these emissions units in accordance with the following requirements:
- a. The emission testing on the BOPF baghouse P926/7BH01 shall be conducted between 12 and 24 months of the effective date of this permit.
 - b. The emission testing on the BOPF scrubbers P926SC01 and P927SC01 shall be conducted between 24 and 36 months of the effective date of this permit and within 6 months of permit expiration.
 - c. The emission testing shall be conducted at the outlet of P926/7BH01 (baghouse control device) and the outlet of P926SC01 and P927SC01 (scrubber control devices) to demonstrate compliance with the allowable mass emission limitation for particulates specified in Table 1 of Subpart FFFFF and b)(2)c.
 - d. The emission testing conducted in item (a) above shall include visible emission observations of any opening in the BOPF or structure housing the BOPF to demonstrate compliance with the opacity limitation on secondary emissions specified in b)(2)c.iii.
 - e. The test method(s) and procedures outlined in 40 CFR 63.7822 and 63.7823 shall be employed to demonstrate compliance with the allowable mass emission rate and opacity limitation.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.
 - f. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - g. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
 - h. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

- i. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart FFFFF]

g) **Miscellaneous Requirements**

- (1) None.



31. Emissions Unit Group - Boiler House #2: B007, B008, B009, and B010

EU ID	Operations, Property and/or Equipment Description
B007	Boiler No. 1, 211 MMBtu/hr boiler, firing blast furnace gas and natural gas
B008	Boiler No. 4, 211 MMBtu/hr boiler, firing blast furnace gas and natural gas
B009	Boiler No. 3, 211 MMBtu/hr boiler, firing blast furnace gas and natural gas
B010	Boiler No. 2, 211 MMBtu/hr boiler, firing blast furnace gas and natural gas

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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-10(B)(1)	See b)(2)a.
c.	OAC rule 3745-18-15(C)(1)	Sulfur dioxide emissions shall not exceed 0.90 pounds per MMBtu actual heat input.
d.	40 CFR Part 63, Subpart DDDDD [40 CFR 63.7480-7575] National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters	Exemption pursuant to 40 CFR 63.7491(k). See b)(2)b.

(2) Additional Terms and Conditions

a. Particulate emissions shall not exceed the following:

i. 0.040 pound of particulate emissions per MMBtu of actual heat input when burning only blast furnace gas or any mixture of blast furnace gas with natural gas; and

ii. 0.020 pound of particulate emissions per MMBtu of actual heat input when burning only natural gas.

b. Blast furnace gas fuel-fired boilers are not subject to the requirements of 40 CFR Part 63, Subpart DDDDD based on the definition found in 63.7575. A blast furnace gas fuel-fired boiler is defined as an industrial/commercial/institutional boiler that receives 90 percent or more of its total annual gas volume from blast furnace gas.

The permittee shall comply with the monitoring and record keeping requirements specified in d)(5) to demonstrate that these emissions units are not subject to 40 CFR Part 63, Subpart DDDDD, under the exemption in 40 CFR 63.7491(k).

If after the compliance date of this subpart (January 31, 2016) or an alternative compliance date as provided in 63.6(i), the emissions unit exceeds the gas volume levels specified in the exemption, the applicable existing source provisions of 40 CFR Part 63, Subpart DDDDD, shall apply to the emissions unit on the date that the emissions unit became subject to this subpart.

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or blast furnace gas in the emissions unit.

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

(2) The quality of the blast furnace gas and natural gas burned in the emissions unit shall have a combination of sulfur content and heat content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.90 pound sulfur dioxide per MMBtu of actual heat input.

[Authority for Term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-15(C)]

d) Monitoring and/or Recordkeeping Requirements

(1) Monitoring and record keeping for sulfur content is not required for natural gas because the sulfur dioxide emission rate from the burning of natural gas is less than the allowable sulfur dioxide emission rate in b)(1) of these terms and conditions pursuant to OAC rule 3745-18-04(F)(4).

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

(2) Monitoring and record keeping for sulfur content is not required for blast furnace gas because the sulfur dioxide emission rate from the burning of blast furnace gas is less than the allowable sulfur dioxide emission rate in b)(1) of these terms and conditions. The permittee shall comply with the testing requirements for blast furnace gas combustion in f)(2) to confirm the actual emission rate.

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

- (3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving the emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

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

- (4) For each day during which the permittee burns a fuel other than natural gas or blast furnace gas, the permittee shall maintain a record of the type and quantity of fuel burned in the emissions unit.

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

- (5) The permittee shall maintain records which document that the emissions unit receives 90 percent or more of its total annual gas volume from blast furnace gas.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart DDDDD]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. any exceedance of the allowable sulfur dioxide emission limitation in b)(1)c.; and
 - b. each day when a fuel other than natural gas or blast furnace gas was burned in the emissions unit.



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 OAC rule 3745-18-15(C)]

- (2) The permittee shall submit semiannual reports that identify all of the following:
 - a. all days during which any visible particulate emissions were observed from the stacks serving the emissions units; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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) and OAC rule 3745-17-07(A)]

f) **Testing Requirements**

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

- a. **Emission Limitation:**

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-03(B)(1)]

- b. **Emission Limitations:**

0.040 pound of particulate emissions per MMBtu of actual heat input when burning only blast furnace gas or any mixture of blast furnace gas with natural gas; and

0.020 pound of particulate emissions per MMBtu of actual heat input when burning only natural gas.



Applicable Compliance Method:

Compliance with the particulate emission limitation when burning blast furnace gas may be based upon the emission factor of 0.035 lb PE/MMBtu found in US EPA AP-42 Section 12.5, Table 12.5-1, dated 10/1986.

Compliance with the particulate emission limitation when burning natural gas may be determined in accordance with the following equation:

$$E \text{ (lb/MMBtu)} = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1000 \text{ Btu}) \times (1,000,000 \text{ Btu/MMBtu}) = 0.0019 \text{ lb/MMBtu}$$

Where: E = particulate emission rate from natural gas, in lb/MMBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate matter from burning natural gas, from AP-42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1000 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/MMBtu = conversion from Btu to MMBtu.

If required, the permittee shall demonstrate compliance with the emission limitations through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B)]

c. Emission Limitation:

Sulfur dioxide emissions shall not exceed 0.90 pounds per MMBtu actual heat input.

Applicable Compliance Method:

For the combustion of natural gas, pursuant to OAC rule 3745-18-04(F)(4), the SO₂ emission rate for the emissions unit shall be considered to be equal to 0.0 pound per MMBtu.

For the combustion of blast furnace gas, the permittee shall demonstrate compliance with this emission limitation through emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6C and the procedures in OAC rule 3745-18-04(E)(7). See f)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-15(C), and OAC rule 3745-18-04(E)]

- (2) The permittee shall conduct, or have conducted, emission testing for the emissions units in accordance with the following requirements.
- a. The emission testing shall be conducted within 18 months of the effective date of this permit.
 - b. The emission testing shall be conducted on one of the four boilers (B007, B008, B009, or B010) to demonstrate compliance with the allowable mass emission limitation for sulfur dioxide when combusting blast furnace gas.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4, 6 and/or 6C of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.
 - e. Not less than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
 - f. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-15(C), and OAC rule 3745-18-04(E)]

g) Miscellaneous Requirements

- (1) None.

32. Emissions Unit Group - Ladle & Tundish Preheating: B027, B028, B029, B030, B031, and B032

EU ID	Operations, Property and/or Equipment Description
B027	Preheater 1, 15 MMBtu natural gas direct-fired ladle preheater
B028	Preheater 2, 15 MMBtu natural gas direct-fired ladle preheater
B029	Preheater 3, 15 MMBtu natural gas direct-fired ladle preheater
B030	V Ladle Preheater, 15 MMBtu natural gas direct-fired ladle preheater
B031	Tundish Preheater 1, 12 MMBtu natural gas direct-fired ladle preheater
B032	Tundish Preheater 2, 12 MMBtu natural gas direct-fired ladle preheater

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 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a.
c.	OAC rule 3745-18-06	See b)(2)b.

(2) Additional Terms and Conditions

a. The requirement to employ reasonably available control measures is satisfied by the exclusive use of natural gas as a fuel.

b. There is no applicable SO₂ emission limitation from OAC rule 3745-18-06 because the emissions unit burns only natural gas, is not fuel burning equipment as defined in OAC rule 3745-18-01(B)(4), and the process weight rate, as defined in OAC rule 3745-18-01(B)(14), is equal to zero.

c) Operational Restrictions

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

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day 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 the emissions unit.

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the emissions unit

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)]

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(B)]

g) Miscellaneous Requirements

- (1) None.



33. Emissions Unit Group - Materials Handling: F003, F004, F005, F008, and F010

EU ID	Operations, Property and/or Equipment Description
F003	a) Wilputte Coal Handling – No. 2 Coke Plant
F004	Belt conveyors (3), belt conveyor transfer to bins, screw conveyor transfer to Larry Cars Still Coal Handling – No. 1 Coke Plant (now used to feed No. 2 Coke Plant) Railcar unloading, belt conveyors (12), yard stacker loading and unloading, truck unloading, coal crushing and screening
F005	Coke Handling – No. 2 Coke Plant Railcar unloading, Hot Car (from quench tower) unloading, belt conveyors (4), Gyrex grinding and screening, Gyrex transfer to reject pile, Gyrex transfer to conveyor
F008	Iron Ore Pellet Screening and Handling Belt conveyors (8), screening, fines transfer
F010	Iron Ore Pellet Unloading Railcar unloading, belt conveyors (3), conveyor loading and unloading to ore yard, truck unloading

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 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the visible emission limitation specified in b)(1)a.



Effective Date: To be entered upon final issuance

In accordance with the permittee's permit application, the permittee has committed to utilizing total enclosures, partial enclosures, watering, and/or a combination of these control measures in order to minimize or eliminate visible particulate emissions of fugitive dust from the material handling operations. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each material processing and handling operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material Handling Operation(s)</u>	<u>Minimum Inspection Frequency</u>
All Operations	Once During Each Day of Operation

The inspections shall be performed during representative, normal storage pile operating conditions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (2) The permittee shall maintain records of the following information for the material processing and handling operations:
 - a. the date and reason any required inspection was not performed;
 - 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.

The information under item (d) above shall be kept separately for each material handling operation identified above, 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), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

e) Reporting Requirements

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



- a. each day during which an inspection of the material processing and handling operations was not performed by the required frequency; and
- b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

f) Testing Requirements

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

- a. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

The visible emission observations shall be performed at the appropriate non-stack egress points from the emissions unit.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(B)]

g) Miscellaneous Requirements

- (1) None.

34. Emissions Unit Group - Pickling Lines: P023 and P024

EU ID	Operations, Property and/or Equipment Description
P023	No. 5 Continuous steel pickling line with a wet scrubber
P024	No. 4 Continuous steel pickling line with a wet scrubber, and tension leveler operation with baghouse

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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
b.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)b. The grain of particulate emissions per dry standard cubic foot limitation required by this rule is less stringent than the limitations established pursuant to 40 CFR Part 63, Subpart CCC, for the scrubbers.
d.	OAC rule 3745-17-11(B)(1)	The emission limitation established by this rule is less stringent than the emission limitation and control requirements established pursuant to 40 CFR Part 63, Subpart CCC. Particulate emissions are assumed to be equal to or less than HCl emissions.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-09(OO)(2)	The VOC content of any rust preventive oil employed shall not exceed 3.3 pounds of VOC per gallon of oil, excluding water and exempt solvents.
f.	40 CFR Part 63, Subpart CCC (40 CFR 63.1155-1174) National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling-HCl Process Facilities and Hydrochloric Acid Regeneration Plants [In accordance with 40 CFR 63.1155 and 63.1156, this emissions unit is a continuous pickling line using hydrochloric acid located at an existing steel pickling facility subject to the emissions limitations and control measures specified in this section.]	See b)(2)a. and c)(1).
g.	40 CFR Part 63, Subpart A (40 CFR 63.1155(c))	Table 1 to Subpart CCC of 40 CFR Part 63 – Applicability of General Provisions (Subpart A) to Subpart CCC shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
h.	40 CFR Part 64 <i>Compliance Assurance Monitoring (CAM)</i>	<u>For emissions unit P024 only (tension leveler baghouse):</u> See b)(2)c., d)(5)-d)(9), e)(4), e)(5), and f)(4).

(2) Additional Terms and Conditions

- a. Pursuant to 40 CFR 63.1157(a), the permittee shall not cause or allow to be discharged into the atmosphere from a pickling line:
 - i. Any gases that contain HCl in a concentration in excess of 18 parts per million by volume (ppmv); or
 - ii. HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.
- b. The permittee shall use hoods, fans, and other equipment to adequately enclose, contain, capture and vent the particulate emissions from the tension leveler



operation on the continuous pickling line P024 to the baghouse P024BH01. The control equipment shall meet the following requirement:

- i. the collection efficiency of the hooding and ventilation equipment associated with the tension leveler 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
 - ii. the tension leveler baghouse shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases.
- c. At all times, the permittee shall maintain the P024BH01 monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64.7]

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart CCC, including the following sections:

63.1159(b)	Operational and equipment standards for HCl storage vessels associated with pickling lines
63.1159(c)	General duty to minimize emissions.
63.1160(b)(1)	Operation and maintenance plan requirements for each emission control device (scrubbers)
63.1161(b)	Establishment of site-specific scrubber operating parameters

[Authority for Term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart CCC]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart CCC, including the following sections:

63.1162(a)(2), (a)(4)-(a)(6)	Scrubber continuous monitoring and record keeping requirements
63.1162(c)	Hydrochloric acid storage vessel inspection
63.1165	Record keeping and retention requirements

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCC]

- (2) The permittee shall collect and record the following information on a monthly basis:
- a. the name and identification of each rust preventative oil employed; and
 - b. the VOC content, in pounds per gallon, excluding water and exempt solvents, of each rust preventative oil employed.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(f)]

- (3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the fugitive egress points for the emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

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

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

If the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check indicates abnormal visible emissions, the frequency of emissions checks shall revert to daily until such time as there are 30 consecutive operating days of normal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(A), and OAC rule 3745-17-08(B)]

- (5) The CAM plan for emissions unit P024 has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the pressure drop across the baghouse serving the tension leveler.

The baghouse operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements in d)(7). The baghouse indicator range for the pressure drop across the baghouse is specified in d)(6). When the monitored value for pressure drop is outside of this range, corrective action (including, but not limited to, an evaluation of the emissions unit and baghouse) will be required.

Upon detecting an excursion of the pressure drop across the baghouse, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the

cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.7]

- (6) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 2 to 10 inches of water.

This range is 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 range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range 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), OAC rule 3745-17-08(B), and 40 CFR Part 64.3]

- (7) The permittee shall properly operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when emissions unit P024 is in operation, including periods of startup and shutdown. The permittee shall record once per day the pressure drop across the baghouse. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop varies from the range established in accordance with d)(6) of this permit, the permittee shall promptly investigate the cause of the excursion. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the excursion was first observed;
- b. the magnitude of the excursion 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 an excursion, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range 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 excursion 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 corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was an excursion;
- j. the pressure drop readings 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.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-08(B), 40 CFR Part 64.7, and 40 CFR Part 64.9]

- (8) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the 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, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring 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 64.7]

- (9) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for Term: OAC rule 3745-77-07(C)(1), 40 CFR Part 64.7, and 40 CFR Part 64.8]

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart CCC, including the following sections:



63.1163(d)	Notification of intent to test
63.1163(e)	Notification of compliance status
63.1164(a)	Reporting results of performance tests
63.1164(c)	Reporting malfunctions

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCC]

- (2) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any monthly record showing that a non-compliant rust preventative oil was employed. The notification shall include a copy of such record and shall be sent to the Southwest Ohio Air Quality Agency within 30 days after the end of the calendar quarter during which the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(g)]

- (3) The permittee shall submit semiannual reports that identify:
- a. all days during which any visible particulate emissions were observed from the scrubber stacks serving the emissions units;
 - b. all days during which any visible particulate emissions were observed from the baghouse stack serving emissions unit P024;
 - c. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving the emissions units; and
 - d. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (4) 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 emissions unit P024 was in operation and the tension leveler process emissions were not vented to the baghouse;
 - b. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified in d)(6) and the cause of each incident;

- c. the date, time, and duration of any downtime of the baghouse continuous monitoring equipment (other than downtime associated with QA/QC or other calibration checks) while emissions unit P024 was in operation and the cause of each incident;
- d. the corrective action(s) taken for each incident described in (a) and (b);
- e. an identification of each incident described in (a) and (b) where a prompt investigation was not conducted;
- f. an identification of each incident described in (a) and (b) where prompt corrective action, that would bring emissions unit P024 into compliance and/or the baghouse pressure drop indicator ranges defined in d)(6) into an acceptable range, was determined to be necessary and was not taken; and
- g. an identification of each incident described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action(s).

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), OAC rule 3745-17-08(B), and 40 CFR Part 64.9]

- (5) If the permittee is required under 40 CFR Part 64.8 and d)(9) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64.9]

f) Testing Requirements

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

- a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).



No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)]

b. Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

Visible emission observations shall be made at egress points (i.e., doors closest to the pickler) of the building housing the pickler.

No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(B)]

c. Emission Limitation:

The control equipment (baghouse P024BH01) achieves an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases.

Applicable Compliance Method:

Compliance shall be determined through performance testing in accordance with 40 CFR Part 60, Appendix A, Methods 1-5. See f)(4).

[Authority for Term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-08(B)]

d. Emission Limitation:

The VOC content of any rust preventive oil employed shall not exceed 3.3 pounds of VOC per gallon of oil, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitations specified in b)(1)e. may be demonstrated by the information collected and recorded in d)(2).

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix



Effective Date: To be entered upon final issuance

A, an owner or operator determines that Method 24 or 24A 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10(B), and OAC rule 3745-21-09(OO)]

e. Emission Limitations:

The permittee shall not cause or allow to be discharged into the atmosphere from a pickling line:

- i. Any gases that contain HCl in a concentration in excess of 18 parts per million by volume (ppmv); or
- ii. HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.

Applicable Compliance Method:

Compliance with the HCl emission limitations shall be demonstrated through emission testing conducted in accordance with the requirements of 40 CFR Part 63, Subpart CCC. See f)(2) and f)(3). Pursuant to Subpart CCC, the permittee must conduct performance tests annually during the term of this Title V permit for scrubber emissions, unless an alternative schedule is approved by the applicable permitting authority, but no less frequently than every 2 ½ years or twice during the Title V permit term.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCC]

- (2) The permittee shall comply with the applicable performance testing and compliance requirements required under 40 CFR Part 63, Subpart CCC, including the following sections:

63.1161(a)	Initial performance tests and compliance requirements
63.1161(d)	Performance test methods
63.1162(a)(1)	Subsequent performance tests [see f)(1)e. above]

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCC]

- (3) The permittee shall conduct, or have conducted, emission testing for the emissions units in accordance with the following requirements:

- a. The emission testing on scrubbers P023SC01 and P024SC01 shall be conducted annually unless an alternative schedule is approved by the applicable

permitting authority, but no less frequently than every 2 ½ years or twice during the Title V permit term.

- b. The emission testing shall be conducted at the outlet of P023SC01 (scrubber control devices for P023) and the outlet of P024SC01 (scrubber control devices for P024) to demonstrate compliance with the allowable HCl mass emission limitations specified in Subpart CCC and b)(2)a.
- c. The test method(s) and procedures outlined in 40 CFR 63.1161 shall be employed to demonstrate compliance with the allowable HCl mass emission rates.

Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Southwest Ohio Air Quality Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).
- f. Personnel from the Southwest Ohio Air Quality Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Southwest Ohio Air Quality Agency.

[Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart CCC]

- (4) The permittee shall conduct, or have conducted, emission testing on emissions unit P024 in accordance with the following requirements:
- a. The emission testing shall be conducted within 18 months of the effective date of this permit.
 - b. The emission testing shall be conducted at the outlet of baghouse P024BH01 to demonstrate compliance with the allowable mass emission limitation of 0.030 grain per dscf of exhaust gases for particulates.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

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

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. During the test, the pressure drop across the baghouse shall be recorded at least every 15 minutes.
 - e. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this 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 under these conditions 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 appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
 - g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following



Draft Title V Permit
AK Steel Corporation
Permit Number: P0105157
Facility ID: 1409010006

Effective Date: To be entered upon final issuance

completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-08(B), and 40 CFR Part 64]

g) Miscellaneous Requirements

- (1) None.



35. Emissions Unit Group - Slab Reheat Furnaces: P009, P010, P011, and P012

EU ID	Operations, Property and/or Equipment Description
P009	No. 3 598 MMBtu per hour Slab Furnace / 305 MMBtu per hour Waste Heat Boiler
P010	No. 2 598 MMBtu per hour Slab Furnace / 305 MMBtu per hour Waste Heat Boiler
P011	No. 1 598 MMBtu per hour Slab Furnace / 305 MMBtu per hour Waste Heat Boiler
P012	No. 4 598 MMBtu per hour Slab Furnace / 305 MMBtu per hour Waste Heat Boiler

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 3745-17-07(A)(1)	See b)(2)b.
b.	OAC rule 3745-17-11(A)	See b)(2)a.
c.	OAC rule 3745-18-15(C)(2)	Sulfur dioxide emissions shall not exceed 1.1 pounds/MMBtu of heat input.

(2) Additional Terms and Conditions

- a. OAC rule 3745-17-11 does not apply. Table I does not apply because the process weight is equal to zero as defined in OAC rule 3745-17-01(B)(4). Figure II does not apply because the uncontrolled mass rate of particulate emissions is less than 10 pounds per hour as per OAC rule 3745-17-11(A)(2)(a)(ii).
- b. Because OAC rule 3745-17-11 does not apply, the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) do not apply.

c) Operational Restrictions

(1) The quality of the natural gas, fuel oil, and coke oven gas burned in the emissions units shall a combination of sulfur content and heat content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.1 pounds sulfur dioxide/MMBtu of actual heat input.

[Authority for Term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-15(C)(2)]

- (2) The permittee shall burn only natural gas, fuel oil, and coke oven gas in the emissions units.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For each shipment of oil received for burning in the emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-15(C), and OAC rule 3745-18-04(E)]

- (2) The permittee shall collect daily grab samples of the coke oven gas burned in the emissions unit as specified in term d)(3) for emissions unit P067. The following information shall be collected and recorded on a quarterly basis:
 - a. The total cubic feet of coke oven gas burned;
 - b. The average sulfur content of the samples taken, recorded in percent by weight, of the coke oven gas (the grains of hydrogen sulfide (H₂S) per 100 dry standard cubic feet of coke oven gas shall be converted to a decimal fraction of sulfur by multiplying the grains of H₂S per 100 cubic feet times 1 pound H₂S per 7000 grains of H₂S times 0.94 pound of sulfur per 1 pound of H₂S, dividing by 100 (dscft/hdscft), and dividing by the density of coke oven gas (0.027 pound per cubic foot));
 - c. The heat content of the coke oven gas, in Btu per cubic foot. (The heat content shall be determined using the ASTM D1826-88 compliant Thermo Electron Corporation Flo-Cal Instrument continuous recording calorimeter, or equivalent, in the slab furnace/waste heat boiler complex on the coke oven gas supply line). The average heat content of natural gas shall be assumed to be 1000 Btu/cubic foot; and

- d. The average sulfur dioxide emission rate for the coke oven gas, recorded as pounds of sulfur dioxide/MMBtu actual heat input (the resulting decimal fraction of sulfur and heat content determined in b. and c. above shall be used as input into the equation defined in OAC rule 3745-18-04(F) to calculate the sulfur dioxide emission rate).

The H₂S content, heat content, and sampling procedures for the coke oven gas shall be based on approved ASTM procedures.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-15(C), and OAC rule 3745-18-04(E)]

- (3) Monitoring and record keeping for sulfur content is not required for natural gas because the sulfur dioxide emission rate from the burning of natural gas is less than the allowable sulfur dioxide emission rate in b)(1) of these terms and conditions pursuant to OAC rule 3745-18-04(F)(4).

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

- (4) For each day during which the permittee burns a fuel other than natural gas, fuel oil, and coke oven gas, the permittee shall maintain a record of the type and quantity of fuel burned in the emissions unit.

[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. any exceedance of the allowable sulfur dioxide emission limitation in b)(1)c.; and
 - b. each day when a fuel other than natural gas, fuel oil, and coke oven gas was burned in the emissions unit.

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 OAC rule 3745-18-15(C)]

f) Testing Requirements

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

Emission Limitation:

Sulfur dioxide emissions shall not exceed 1.1 pounds/MMBtu of heat input.



Applicable Compliance Method:

Continuous compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by the monitoring and record keeping requirements in d)(1) and d)(2) documenting that the sulfur content of each shipment of oil received, or the composite samples of coke oven gas burned, meets the limitation when calculated in accordance with OAC rule 3745-18-04(F). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

For the combustion of natural gas, pursuant to OAC rule 3745-18-04(F)(4), the SO₂ emission rate for the emissions unit shall be considered to be equal to 0.0 pound per MMBtu.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-15(C), and OAC rule 3745-18-04(E)]

- g) Miscellaneous Requirements
 - (1) None.



36. Emissions Unit Group - Temper Mills / Winding: P091, P092, P093, and P095

EU ID	Operations, Property and/or Equipment Description
P091	No. 5 Temper Mill
P092	No. 6 Temper Mill
P093	No. 1 Corrective Rewind Line
P095	No. 7 Temper 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 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a.
c.	OAC rule 3745-21-09(OO)	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee shall employ good operating practices for these emissions units to minimize or eliminate fugitive dust emissions.

b. The VOC content of coatings employed in the emissions units shall not exceed the following:

i. For rolling oils, the VOC content shall not exceed 6.9 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(1).

ii. For rust preventative oils, the VOC content shall not exceed 3.3 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC



rule 3745-21-09(OO)(2). This term applies only to P091, P092, and P095 but not to P093 which does not use rust preventative oils.

- iii. For prelube oils, the VOC content shall not exceed 0.8 pound per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(4).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and, when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving the emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed from fugitive egress points, the permittee shall also note the following in the operations log:
 - a. the location and 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit).

With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

- (2) The permittee shall collect and record the following information on a monthly basis:
 - a. The name and identification of each coating employed (rust preventative oil, rolling oil, and pre-lube oil), as applied; and



- b. The VOC content, in pounds per gallon, excluding water and exempt solvents, in pounds per gallon, of each rust preventative oil, rolling oil, and pre-lube oil, as applied.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(f)]

e) Reporting Requirements

- (1) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any monthly record showing that a non-compliant rust preventative oil, rolling oil or prelube oil was employed. The notification shall include a copy of such record and shall be sent to the Southwest Ohio Air Quality Agency within 30 days after the end of the calendar quarter during which the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(OO), and OAC rule 3745-21-09(B)(3)(g)]

- (2) The permittee shall submit semiannual reports that identify:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving the emissions units; and
 - b. any corrective actions taken to minimize or eliminate the visible emissions.

These reports shall be submitted to the Southwest Ohio Air Quality Agency 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), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B)]

f) Testing Requirements

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

- a. Emission Limitation

Visible particulate emissions of fugitive dust shall not exceed twenty per cent opacity as a three-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(3).

Visible emission observations shall be made at the egress points (e.g., doors closest to the coating operation) of the building housing the emissions units.



No visible emissions observations are specifically required to demonstrate compliance with this emission limitation but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-03(B)(3)]

b. Emission Limitations:

- i. For rolling oils, the VOC content shall not exceed 6.9 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(1).
- ii. For rust preventative oils, the VOC content shall not exceed 3.3 pounds per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(2).
- iii. For prelube oils, the VOC content shall not exceed 0.8 pound per gallon of oil, excluding water and exempt solvents as outlined in OAC rule 3745-21-09(OO)(4).

Applicable Compliance Method:

Compliance with the VOC content limitations specified in b)(2)b. may be demonstrated by the information collected and recorded in d)(2).

USEPA Methods 24 and 24A shall be used to determine the VOC contents for the coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A 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 to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

[Authority for Term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10(B), and OAC rule 3745-21-09(OO)]

g) Miscellaneous Requirements

- (1) None.