



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

5/31/2016

Mr. Jeffrey Brown  
TimkenSteel Corporation - Faircrest Steel Plant  
1835 Dueber Avenue, S.W.  
Canton, OH 44706

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 1576222001  
Permit Number: P0120618  
Permit Type: Administrative Modification  
County: Stark

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

**How to appeal this permit**

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

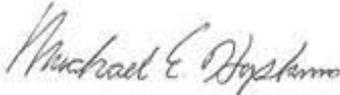
This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

## **What should you do if you notice a spill or environmental emergency?**

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Canton City Health Department at (330)489-3385 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: U.S. EPA  
Canton; Pennsylvania; West Virginia



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install**

for

**TimkenSteel Corporation - Faircrest Steel Plant**

Facility ID:	1576222001
Permit Number:	P0120618
Permit Type:	Administrative Modification
Issued:	5/31/2016
Effective:	5/31/2016





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
TimkenSteel Corporation - Faircrest Steel Plant

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**Final Permit-to-Install**  
TimkenSteel Corporation - Faircrest Steel Plant  
**Permit Number:** P0120618  
**Facility ID:** 1576222001  
**Effective Date:** 5/31/2016

## Authorization

Facility ID: 1576222001  
Facility Description: Steel mill w/ EAF  
Application Number(s): M0003712, M0003734, M0003905, M0003906, M0003907, M0003908  
Permit Number: P0120618  
Permit Description: Administrative modification based on facility-requested changes to BTU ratings, emission factors, and type of fuel used for several fuel burning emissions units.  
Permit Type: Administrative Modification  
Permit Fee: \$3,250.00  
Issue Date: 5/31/2016  
Effective Date: 5/31/2016

This document constitutes issuance to:

TimkenSteel Corporation - Faircrest Steel Plant  
1835 Dueber Avenue, S.W.  
Canton, OH 44706

of a Permit-to-Install for the emissions unit(s) identified on the following page.

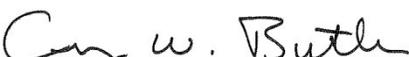
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department  
420 Market Avenue  
Canton, OH 44702-1544  
(330)489-3385

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0120618

Permit Description: Administrative modification based on facility-requested changes to BTU ratings, emission factors, and type of fuel used for several fuel burning emissions units.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Emissions Unit ID: P121**  
 Company Equipment ID: Ladle Preheater #4  
 Superseded Permit Number: 15-860  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: P127**  
 Company Equipment ID: Soaking Pit #10  
 Superseded Permit Number: 15-01339  
 General Permit Category and Type: Not Applicable

**Group Name: Cleaver-Brooks Package Boilers**

<b>Emissions Unit ID:</b>	<b>B101</b>
Company Equipment ID:	Boiler #1
Superseded Permit Number:	15-144
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B102</b>
Company Equipment ID:	Boiler #2
Superseded Permit Number:	15-144
General Permit Category and Type:	Not Applicable

**Group Name: Ladle Dryer and Ladle Preheater**

<b>Emissions Unit ID:</b>	<b>P115</b>
Company Equipment ID:	Ladle Dryer
Superseded Permit Number:	15-144
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P117</b>
Company Equipment ID:	Ladle Preheater #1
Superseded Permit Number:	15-144
General Permit Category and Type:	Not Applicable

**Group Name: Soaking Pits 1-4 and 5-8**

<b>Emissions Unit ID:</b>	<b>P104</b>
Company Equipment ID:	Soaking Pits 1-4
Superseded Permit Number:	15-144
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P105</b>
Company Equipment ID:	Soaking Pits 5-8
Superseded Permit Number:	15-144
General Permit Category and Type:	Not Applicable



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**Effective Date:**5/31/2016

**Group Name: Soaking Pits 11 and 12**

<b>Emissions Unit ID:</b>	<b>P123</b>
Company Equipment ID:	Soaking Pit #12
Superseded Permit Number:	15-1157
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P124</b>
Company Equipment ID:	Soaking Pit #11
Superseded Permit Number:	15-1162
General Permit Category andType:	Not Applicable



**Final Permit-to-Install**  
TimkenSteel Corporation - Faircrest Steel Plant  
**Permit Number:** P0120618  
**Facility ID:** 1576222001  
**Effective Date:**5/31/2016

## **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.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. 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 re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying 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.

#### **4. 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, 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.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Canton City Health Department.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Canton City Health Department. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Canton City Health Department every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Canton City Health Department in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted

local air 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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (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 ORC section 3704.08.
  - (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 Canton City Health Department 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. Air Pollution Nuisance**

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

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Canton City Health Department.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Canton City Health Department. 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.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

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

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

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

**19. 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.



**Final Permit-to-Install**  
TimkenSteel Corporation - Faircrest Steel Plant  
**Permit Number:** P0120618  
**Facility ID:** 1576222001  
**Effective Date:**5/31/2016

## **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.



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TimkenSteel Corporation - Faircrest Steel Plant  
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## **C. Emissions Unit Terms and Conditions**

**1. P121, Ladle Preheater No. 4**

**Operations, Property and/or Equipment Description:**

Natural gas-fired 13 mmBtu/hr Ladle Preheater #4

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)  (Supersedes PTI 15-860 issued 11/24/1993)  [Administrative modification to Best Available Technology (BAT) Determination to account for increased maximum natural gas input from 10 mmBtu/hr to 13 mmBtu/hr. Also clarifies that all particulate emissions are assumed to be PM <sub>10</sub> ]	Particulate emissions less than 10 microns in diameter (PM <sub>10</sub> ) shall not exceed 0.02 lb/mmBtu, 0.26 lb/hr and 1.14 tons/year.  Nitrogen oxides (NOx) emissions shall not exceed 0.10 lb/mmBtu, 1.3 lb/hr and 5.69 tons/year.  Carbon monoxide (CO) emissions shall not exceed 0.02 lb/mmBtu, 0.26 lb/hr, and 1.14 tons/year.  See b)(2)a., b)(2)b., b)(2)c., b)(2)d., and c)(1).
b.	OAC rule 3745-17-07(A)(1)	Exempt. See b)(2)e.
c.	OAC rule 3745-17-11	Exempt. See b)(2)f.
d.	OAC rule 3745-17-10	Exempt. See b)(2)g.
e.	OAC rule 3745-18-06(E) OAC rule 3745-18-82(A)	Exempt. See b)(2)h.

(2) Additional Terms and Conditions

a. All particulate emissions are assumed to be less than 10 microns in diameter and are designated as PM<sub>10</sub>.

b. The Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas firing only, and

regularly maintaining P121 and its associated control equipment in accordance with good engineering practices and the manufacturers recommendations in order to minimize air contaminant emissions.

- c. The emissions limitations for PM<sub>10</sub>, NO<sub>x</sub> and CO are based on the emission unit's potential to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.
- d. The uncontrolled potential emissions of sulfur dioxide (SO<sub>2</sub>) and volatile organic compounds (VOC) when firing natural gas in this emissions unit (EU) are negligible (less than 10 pounds per day), and therefore emissions limits for these pollutants have not been established.
- e. This EU is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the EU is not subject to the requirements of OAC rule 3745-17-11.
- f. The burning of natural gas is the only source of particulate emissions from this EU. The uncontrolled mass rate of particulate emissions from this EU 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 pursuant to OAC rule 3745-17-11(A)(4) because the process weight that causes any emissions of particulate matter is equal to zero.
- g. This EU is designed such that the products of combustion come into direct contact with materials being processed and therefore do not meet the definition of "fuel burning equipment" given in OAC rules 3745-17-01(B)(5) and 3745-18-01(B)(4). It is, therefore, exempt from the emission limitations and control requirements contained in OAC rule 3745-17-10 for fuel burning equipment but is subject to the requirements in OAC rule 3745-18-06 as process equipment.
- h. The burning of natural gas is the only source of sulfur dioxide from this EU. Pursuant to OAC rule 3745-18-06(C), this EU is exempt from OAC rules 3745-18-06(E) and 3745-18-82 because the process weight input (excludes gaseous fuels) that causes any emissions of sulfur dioxide is equal to zero, which is less than 1,000 lbs/hour.
- i. In addition to EU P121; EUs P102, P103, P115, P117, P119, P120, P901, and P902 are also located in the facility meltshop building and are typically in operation during the operation of this EU.

The combined emissions from these EUs are captured by the meltshop building evacuation system and exhaust to a common meltshop baghouse (BHC-1). Therefore it is not practical to measure the emissions from P121 individually.

Demonstration of compliance with the individual PM<sub>10</sub>, NO<sub>x</sub>, and CO emissions limitations for P121 pursuant to OAC rule 3745-31-05(A)(3) above is specified in the "Testing Requirements", section f), of this permit.

c) Operational Restrictions

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

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 the fuel burned in this emissions unit.
- (2) Records shall be maintained of the total annual amount of natural gas burned in this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify, at a minimum, each day when a fuel other than natural gas was burned in this emissions unit
- (2) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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:

Particulate emissions less than 10 microns in diameter (PM<sub>10</sub>) shall not exceed 0.02 lb/mmBtu, 0.26 lb/hr and 1.14 tons/year.

Applicable Compliance Method:

The lb/mmBtu emissions factor was provided by the facility in their permit application for the original PTI 15-860 issued 11/24/1993 for this EU.

The 0.26 lb/hr short term limitation was calculated by multiplying the 0.02 lb/mmBtu emissions factor by the 13 mmBtu/hr maximum fuel input.

The ton per year emissions limitation was developed by multiplying the short term emissions limitation by the the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the individual PM<sub>10</sub> emissions factor of 0.020 lb PM<sub>10</sub>/mmBtu from emissions unit P121 exhausting to meltshop baghouse (BHC-1) is assumed provided compliance with the combined PM<sub>10</sub> emissions limitation



from the baghouse of 0.076 lb PM<sub>10</sub>/ton molten steel is demonstrated by stack testing of the baghouse exhaust gases in accordance with the procedure set forth for testing of the EAF (P102) in the facility's TV permit.

b. Emission Limitation:

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.10 lb/mmBtu, 1.3 lb/hr and 5.69 tons/year.

Applicable Compliance Method:

The lb/mmBtu emissions factor was provided by the facility in their permit application for the original PTI 15-860 issued 11/24/1993 for this EU.

The 1.3 lb/hr short term limitation was calculated by multiplying the 0.10 lb/mmBtu emissions factor by the 13 mmBtu/hr maximum fuel input

The ton per year emissions limitation was developed by multiplying the short term emissions limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the individual NO<sub>x</sub> emissions limitation of 0.10 lb NO<sub>x</sub>/mmBtu from emissions unit P121 exhausting to meltshop baghouse (BHC-1) is assumed provided compliance with the combined NO<sub>x</sub> emissions limitation from the baghouse of 0.20 lb NO<sub>x</sub>/ton molten steel is demonstrated by stack testing of the baghouse exhaust gases in accordance with the procedure set forth for testing of the EAF (P102) in the facility's TV permit.

c. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.02 lb/mmBtu, 0.26 lb/hr, and 1.14 tons/year.

Applicable Compliance Method:

The lb/mmBtu emissions factor was provided by the facility in their permit application for the original PTI 15-860 issued 11/24/1993 for this EU.

The 0.26 lb/hr short term limitation was calculated by multiplying the 0.02 lb/mmBtu emissions factor by the 13 mmBtu/hr maximum fuel input

The ton per year emissions limitation was developed by multiplying the short term emissions limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, compliance with the individual CO emissions limitation of 0.02 lb CO/mmBtu from emissions unit P121 exhausting to meltshop baghouse (BHC-1)



is assumed provided compliance with the combined CO emissions limitation from the baghouse of 3.5 lb CO/ton molten steel is demonstrated by stack testing of the baghouse exhaust gases in accordance with the procedure set forth for testing of the EAF (P102) in the facility's TV permit.

g) Miscellaneous Requirements

- (1) None.

**2. P127, Soaking Pit #10**

**Operations, Property and/or Equipment Description:**

Soaking Pit #10 to heat steel ingots rated at 20 mmBtu/hr, with oxyfuel (oxygen-enriched natural gas) fired low NOx burners

- 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) OAC rules 3745-31-10 through 3745-31-20  (Supersedes PTI 15-01339 issued 7/15/2003)  [Administrative modification to Best Available Technology (BAT) and Best Available Control Technology (BACT) to account for changing from natural gas to oxyfuel firing with corresponding slight decreases in allowable emissions.]	Particulate emissions less than 10 microns in diameter (PM <sub>10</sub> ) shall not exceed 0.0075 lb/mmBtu, 0.15 lbs/hr, and 0.66 tons/yr. See b)(2)h.  Nitrogen oxides (NOx) emissions shall not exceed 0.14 lb/mmBtu, 2.80 lbs/hr and 12.3 tons/yr.  Carbon monoxide (CO) emissions shall not exceed 0.082 lb/mmBtu/hr, 1.64 lbs/hr and 7.18 tons/yr.  Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.0006 lb/mmBtu, 0.012 lbs/hr, and 0.05 tons/yr.  Volatile organic carbon (VOC) emissions shall not exceed 0.0054 lb/mmBtu, 0.108 lbs/hr, and 0.47 tons/yr.  Visible particulate emissions from the stack serving this emissions unit shall not exceed 5 percent opacity as a six-minute average.  See b)(2)a., b)(2)b., b)(2)g., b)(2)h., and c).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)(1)	Exempt. See b)(2)c.
c.	OAC rule 3745-17-11	Exempt. See b)(2)d.
d.	OAC rule 3745-17-10	Exempt. See b)(2)e.
e.	OAC rule 3745-18-06(E) OAC rule 3745-18-82(A)	Exempt. See b)(2)f.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of oxyfuel (oxygen-enriched natural gas) firing only, the use of low-NOx burners, and compliance with the terms and conditions of this permit.
- b. The emissions limitations for PM<sub>10</sub>, NOx, CO, SO<sub>2</sub>, and VOC are based on the emission unit's potential to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.
- c. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- d. The burning of oxyfuel is the only source of particulate emissions from the emissions unit. The uncontrolled mass rate of particulate emissions from the 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 pursuant to OAC rule 3745-17-11(A)(4) because the process weight that causes any emissions of particulate matter is equal to zero.
- e. This emissions unit is designed such that the products of combustion come into direct contact with materials being processed and therefore do not meet the definition of "fuel burning equipment" given in OAC rules 3745-17-01(B)(5) and 3745-18-01(B)(4). It is, therefore, exempt from the emission limitations and control requirements contained in OAC rule 3745-17-10 for fuel burning equipment and subject to the requirements in OAC rule 3745-18-06 as process equipment.
- f. The burning of oxyfuel is the only source of sulfur dioxide from these emissions units. Pursuant to OAC rule 3745-18-06(C), these emissions units are exempt from OAC rules 3745-18-06(E) and 3745-18-82 because the process weight input (excludes gaseous fuels) that causes any emissions of sulfur dioxide is equal to zero, which is less than 1,000 lbs/hour.
- g. All particulate emissions are assumed to be less than 10 microns in diameter and are designated as PM<sub>10</sub>.

- h. The permittee shall employ "Best Available Control Technology" (BACT) for controlling emissions of PM<sub>10</sub>, CO, VOC, SO<sub>2</sub>, and NO<sub>x</sub>. BACT for this emissions unit has been determined to be compliance with the allowable emissions in b)(1)a. above.
  
- c) **Operational Restrictions**
  - (1) The permittee shall burn only oxyfuel (oxygen-enriched natural gas) as fuel in this emissions unit.
  - (2) The soaking pit, including all associated equipment (including but not limited to low NO<sub>x</sub> burners), shall be operated and maintained in accordance with the manufacturer's specifications.
  
- d) **Monitoring and/or Recordkeeping Requirements**
  - (1) For each day during which the permittee burns a fuel other than oxyfuel, the permittee shall maintain a record of the type and quantity of the fuel burned in this emissions unit.
  - (2) Records shall be maintained of the total annual amount of oxyfuel burned in this emissions unit.
  
- e) **Reporting Requirements**
  - (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than oxyfuel was burned in this emissions unit.
  - (2) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  
- 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:

PM<sub>10</sub> emissions shall not exceed 0.0075 lb/mmBtu, 0.15 lbs/hr, and 0.66tons/yr.
    - Applicable Compliance Method:

The lb/mmBtu emissions limitation was established by converting the 7.6 lbs/10<sup>6</sup> scf emission factor for particulate matter from natural gas combustion (best approximation for oxyfuel) from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (07/98) into lb /mmBtu by dividing the emissions factor by the average heat content of the natural gas supplied to the facility (1,020 Btu/scf). Note: Oxyfuel is about 100% oxygen-enriched natural gas.



The hourly emissions limitation was developed by multiplying the 0.0075 lb/mmBtu emission limitation by the rated heat input of 20 mmBtu/hr.

The annual emission limitation was developed by multiplying the hourly emission limitation (0.15lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emissions limitation.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emissions testing performed in accordance with 40 CFR Part 51, Appendix M, Method 201 or 201A. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

b. Emission Limitation:

Nitrogen oxides (NOx) emissions shall not exceed 0.14 lb/mmBtu, 2.80 lbs/hr and 12.3 tons/yr.

Applicable Compliance Method:

The lb/mmBtu emissions limitation was established by converting the 140 lbs lb/10<sup>6</sup> scf emission factor for NOx from natural gas combustion (best approximation for oxyfuel) from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (07/98) into lb NOx/mmBtu by dividing the emissions factor by the average heat content of the natural gas supplied to the facility (1,020 Btu/scf). Note: Oxyfuel is about 100% oxygen-enriched natural gas.

The hourly emissions limitation was developed by multiplying the 0.14 lb/mmBtu emission limitation by the rated heat input of 20 mmBtu/hr.

The annual emission limitation was developed by multiplying the hourly emission limitation (2.80 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emissions limitation.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 7 or 7E. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

c. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.082 lb/mmBtu/hr, 1.64 lbs/hr and 7.18 tons/yr.



Applicable Compliance Method:

The lb/mmBtu emissions limitation was established by converting the 84 lbs lb/10<sup>6</sup> scf emission factor for CO from natural gas combustion (best approximation for oxyfuel) from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (07/98) into lb CO/mmBtu by dividing the emissions factor by the average heat content of the natural gas supplied to the facility (1,020 Btu/scf). Note: Oxyfuel is about 100% oxygen-enriched natural gas.

The hourly emissions limitation was developed by multiplying the 0.082 lb/mmBtu emission limitation by the rated heat input of 20 mmBtu/hr.

The annual emissions limitation was developed by multiplying the hourly emissions limitation (1.64 lbs/hr) by the maximum annual hours of operation (8,760 hours) and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emissions limitation.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

d. Emission Limitation:

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.0006 lb/mmBtu, 0.012 lb/hr, and 0.05 tons/yr.

Applicable Compliance Method:

The lb/mmBtu emissions limitation was established by converting the 0.6 lbs lb/10<sup>6</sup> scf emission factor for SO<sub>2</sub> from natural gas combustion (best approximation for oxyfuel) from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (07/98) into lb/mmBtu by dividing the emissions factor by the average heat content of the natural gas supplied to the facility (1,020 Btu/scf). Note: Oxyfuel is about 100% oxygen-enriched natural gas.

The hourly emissions limitation was developed by multiplying the 0.0006 lb/mmBtu emission limitation by the rated heat input of 20 mmBtu/hr.

The annual emissions limitation was developed by multiplying the hourly emissions limitation (0.012 lbs/hr) by the maximum annual hours of operation (8,760 hours) and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emissions limitation.



If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division

e. Emission Limitation:

Volatile organic carbon (VOC) emissions shall not exceed 0.0054 lb/mmBtu, 0.108 lbs/hr, and 0.47 tons/yr.

Applicable Compliance Method:

The lb/mmBtu emissions limitation was established by converting the 5.5 lbs lb/10<sup>6</sup> scf emission factor for VOC from natural gas combustion (best approximation for oxyfuel) from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (07/98) into lb /mmBtu by dividing the emissions factor by the average heat content of the natural gas supplied to the facility (1,020 Btu/scf). Note: Oxyfuel is about 100% oxygen-enriched natural gas.

The hourly emissions limitation was developed by multiplying the 0.0054 lb/mmBtu emission limitation by the rated heat input of 20 mmBtu/hr.

The annual emissions limitation was developed by multiplying the hourly emissions limitation (0.108 lbs/hr) by the maximum annual hours of operation (8,760 hours) and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the hourly emissions limitation, compliance shall also be shown with the annual emissions limitation.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

f. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.

**3. Emissions Unit Group -Cleaver-Brooks Package Boilers: B101,B102,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B101	Boiler #1: Cleaver-Brooks natural gas-fired package boiler rated at 56 mmBtu/hr.
B102	Boiler #2: Cleaver-Brooks natural gas-fired package boiler rated at 56 mmBtu/hr.

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)  (Supersedes PTI 15-0144 issued 07/19/1995)  [Administrative modification to Best Available Technology (BAT) Determination to account for deletion of oil firing and reduction in maximum fuel input. Also clarifies that all particulate emissions are assumed to be PM <sub>10</sub> ]	Particulate emissions less than 10 microns in diameter (PM <sub>10</sub> ) shall not exceed 0.015 lb/mmBtu and 3.68 tons/yr.  Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.0006 lb/mmBtu and 0.15 tons/yr.  Nitrogen oxide (NO <sub>x</sub> ) emissions shall not exceed 0.225 lb/mmBtu and 55.19 tons/yr.  Carbon monoxide (CO) emissions shall not exceed 0.10 lb/mmBtu and 24.53 tons/yr.  See section b)(2)a., b)(2)b., b)(2)c., b)(2)d., and c)(1).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving these emissions units shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-10	See b)(2)e.
d.	OAC rule 3745-18-06 OAC rule 3745-18-82(O)(2)	See b)(2)f.
e.	40 CFR 52.1881(b)(9)(vi)(A)	See b)(2)g.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas firing only and compliance with the terms and conditions of this permit.
- b. All particulate emissions are generated from natural gas combustion and are assumed to be less than 10 microns in diameter (designated as PM<sub>10</sub>).
- c. The emissions limitations for PM<sub>10</sub>, NO<sub>x</sub>, SO<sub>2</sub>, and CO are based on each emission unit's potential to emit. Therefore no monitoring, record keeping and reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.
- d. The uncontrolled potential emissions of volatile organic compounds (VOC) when firing natural gas in these emissions units are negligible (less than 10 pounds per day), and therefore emissions limits for this pollutant have not been established.
- e. The particulate emissions limitation of 0.020 lb/mmBtu of actual heat input specified by this rule is equivalent to the particulate emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- f. The sulfur dioxide (SO<sub>2</sub>) emissions limitation of 0.67 lb/mmBtu specified in OAC rule 3745-18-82(O)(2) applies to this emission unit. However, per OAC rule 3745-18-06(A), this emission unit is exempt from that emission limitation, and any other applicable emission limitations listed in OAC rule 3745-18-06 during any calendar day in which natural gas is the only fuel burned.
- g. The sulfur dioxide (SO<sub>2</sub>) emissions limitation of 3.08 lb/mmBtu specified by this rule is less stringent than the emissions limitation required by OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in these emissions units.

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 units.
- (2) Records shall be maintained of the total amount of natural gas burned in each of these emissions units.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify, at a minimum, each day when a fuel other than natural gas was burned in these emissions units.

- (2) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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:

Particulate emissions less than 10 microns in diameter (PM<sub>10</sub>) shall not exceed 0.015 lb/mmBtu and 3.68 tons/yr.

Applicable Compliance Method:

A 0.02 lb/mmBtu emissions limitation for particulate emissions was provided by the facility in their permit application for the original PTI 15-0144 issued 12/21/1981 for these emissions units. However, this was based on oil firing which has been eliminated.

The 0.015 lb/mmBtu emissions limitation was established by dividing the particulate emissions factor of 7.6 lb/10<sup>6</sup> scf for natural gas combustion from AP-42, "Compilation of Air Pollutant Emission Factors", 5<sup>th</sup> Edition, Section 1.4, Table 1.4-2 (07/98) by the natural gas heating value of 1020 Btu/scf. The resulting emissions factor (EF) was increased by a 100% margin to account for the "D" rating assigned to the EF by AP-42.

The ton per year emission limitation was developed by multiplying the lb/mmBtu emission limitation by the rated heat input of 56 mmBtu/hr times the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, compliance with the lb/mmBtu allowable emission limitation demonstrates compliance with the annual emission limitation.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emissions testing performed in accordance with 40 CFR Part 51, Appendix M, Method 201 or 201A. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

b. Emission Limitation:

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.0006 lb/mmBtu and 0.15 tons/yr.

Applicable Compliance Method:

A 0.55 lb/mmBtu emissions limitation for SO<sub>2</sub> emissions was provided by the facility in their permit application for the original PTI 15-0144 issued 12/21/1981



for these emissions units. However, this was based on oil firing which has been eliminated.

The 0.0006 lb/mmBtu emissions limitation was established by dividing the SO<sub>2</sub> emissions factor of 0.6 lb SO<sub>2</sub>/10<sup>6</sup> scf for natural gas combustion from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (07/98) by the natural gas heating value of 1,020 Btu/scf.

The ton per year emission limitation was developed by multiplying the lb/mmBtu emission limitation by the rated heat input of 56 mmBtu/hr times the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, compliance with the lb/mmBtu allowable emission limitation demonstrates compliance with the annual emission limitation.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Method 6 or 6A. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

c. Emission Limitation:

Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 0.225 lb/mmBtu and 55.19 tons/yr.

Applicable Compliance Method:

A 0.25 lb/mmBtu emissions limitation for NO<sub>x</sub> emissions was provided by the facility in their permit application for the original PTI 15-0144 issued 12/21/1981 for this emissions unit. However, this was based on oil firing which has been eliminated.

Stack testing performed on B101 on 4/18/1990 showed a NO<sub>x</sub> emissions factor (EF) of 0.125 lb/mmBtu when firing natural gas. The EF used in this permit was increased by 50% over the test value to adjust for the testing not being performed at 100% of the boiler heat input rating, and by a further 20 % increase to provide a test margin.

The ton per year emission limitation was developed by multiplying the lb/mmBtu emission limitation by the rated heat input of 56 mmBtu/hr times the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, compliance with the lb/mmBtu allowable emission limitation demonstrates compliance with the annual emission limitation.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 7 or 7E. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

d. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.10 lb/mmBtu and 24.53 tons/yr.

Applicable Compliance Method:

A 0.04 lb/mmBtu emissions limitation for CO emissions was provided by the facility in their permit application for the original PTI 15-0144 issued 12/21/1981 for these emissions units. However, this was based on oil firing which has been eliminated.

Stack testing to demonstrate compliance with the 0.04 lb/mmBtu CO emissions limitation has never been performed. The allowable CO emissions in this permit are based on using the most current emissions factor (EF) for CO for natural gas firing taken from AP-42.

The 0.10 lb/mmBtu emissions limitation was established by dividing the CO emissions factor of 84 lb/10<sup>6</sup> scf for natural gas combustion from AP-42, "Compilation of Air Pollutant Emission Factors", 5<sup>th</sup> Edition, Section 1.4, Table 1.4-1 (07/98) by the natural gas heating value of 1020 Btu/scf. The resulting emissions factor (EF) was increased by a 20% margin to account for the "B" rating assigned to the EF by AP-42

The ton per year emissions limitation was developed by multiplying the lb/mmBtu emissions limitation by the rated heat input of 56 mmBtu/hr times the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, compliance with the lb/mmBtu emissions limitation demonstrates compliance with the annual emissions limitation.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

e. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations using the methods and procedures specified in U.S.EPA Reference Method 9.

- (2) The permittee shall conduct, or have conducted, emission testing for Emissions Unit B102 in accordance with the following requirements. The results of the testing for B102 shall be considered representative of the emissions from B101, which is an identical unit:

- a. The emissions testing for B102 shall be conducted within the time schedule specified in the facility's Title V permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NO<sub>x</sub> and CO, in the appropriate averaging period(s).
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:
  - i. for NO<sub>x</sub>, Method 7 of 40 CFR Part 60, Appendix A, and
  - ii. for CO, Method 10 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

- d. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.
- e. The following parameters, as a minimum, shall be monitored and recorded for this emissions unit during the testing at 15-minute intervals:
  - i. the steam flow and feedwater flow rates,
  - ii. the boiler steam outlet temperature and pressure,
  - iii. the feedwater temperature, and
  - iv. the natural gas flow rate.
- f. The total natural gas fired for each test-run shall be recorded and at least one sample of the natural gas fired during the 3 test-runs shall be collected and analyzed to determine its heating value in Btu/scf.
- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air



Pollution Control Division. 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 Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).

- h. Personnel from the Canton City Health Department, Air Pollution Control Division, 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.
- i. 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 Canton City Health Department, Air Pollution Control Division 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 Canton City Health Department, Air Pollution Control Department.

g) Miscellaneous Requirements

- (1) None.

**4. Emissions Unit Group -Ladle Dryer and Ladle Preheater: P115,P117,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P115	13 mmBtu/hr natural gas-fired ladle dryer
P117	13 mmBtu/hr Natural Gas-Fired Ladle Preheater #1

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)  (Supersedes PTI 15-0144 issued 07/19/1995)  [Administrative modification to Best Available Technology (BAT) Determination to account for reduced maximum fuel input. Also clarifies that all particulate emissions are assumed to be PM <sub>10</sub> ]	Particulate emissions less than 10 microns in diameter (PM <sub>10</sub> ) shall not exceed 0.020 lbs/mmBtu and 1.14 tons/yr. See b)(2)a. and b)(2)i.  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 0.50 lb/mmBtu and 28.47 tons/yr.  Carbon monoxide (CO) emissions shall not exceed 0.04 lb/mmBtu and 2.28 tons/yr.  See b)(2)b., b)(2)c., b)(2)d., b)(2)h., and c)(1).
b.	OAC rule 3745-17-07(A)(1)	Exempt. See b)(2)e.
c.	OAC rule 3745-17-11	Exempt. See b)(2)f.
d.	OAC rule 3745-17-10	Exempt. See b)(2)g.
e.	OAC rule 3745-18-06(E) OAC rule 3745-18-82(A)	Exempt. See b)(2)f. and b)(2)g.

(2) Additional Terms and Conditions

a. All particulate emissions are assumed to be less than 10 microns in diameter and are designated as PM<sub>10</sub>.

- b. The Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas firing only.
- c. The emissions limitations for PM<sub>10</sub>, NO<sub>x</sub> and CO are based on the emission unit's potential to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.
- d. The uncontrolled potential emissions of sulfur dioxide (SO<sub>2</sub>) and volatile organic compounds (VOC) when firing natural gas in this emissions unit are negligible (less than 10 pounds per day), and therefore emissions limits for these pollutants have not been established.
- e. These emissions units are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions units are not subject to the requirements of OAC rule 3745-17-11.
- f. The burning of natural gas is the only source of particulate emissions from the emissions units. The uncontrolled mass rate of particulate emissions from each of the emissions units 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 pursuant to OAC rule 3745-17-11(A)(4) because the process weight that causes any emissions of particulate matter is equal to zero.
- g. This emissions units are designed such that the products of combustion come into direct contact with materials being processed and therefore do not meet the definition of "fuel burning equipment" given in OAC rules 3745-17-01(B)(5) and 3745-18-01(B)(4). They are, therefore, exempt from the emission limitations and control requirements contained in OAC rule 3745-17-10 for fuel burning equipment but are subject to the requirements in OAC rule 3745-18-06 as process equipment.
- h. The burning of natural gas is the only source of sulfur dioxide from these emissions units. Pursuant to OAC rule 3745-18-06(C), these emissions units are exempt from OAC rules 3745-18-06(E) and 3745-18-82 because the process weight input (excludes gaseous fuels) that causes any emissions of sulfur dioxide is equal to zero, which is less than 1,000 lbs/hour.
- i. In addition to emissions units P115 and P117, emissions units P102, P103, P119, P120, P121, P901, and P902 are also located in the facility meltshop building and are typically in operation during the operation of this emissions unit.

The combined emissions from these EUs are captured by the meltshop building evacuation system and exhaust to a common meltshop baghouse (BHC-1). Therefore it is not practical to measure the emissions from P115 or P117 individually.

Demonstration of compliance with the individual PM<sub>10</sub>, NO<sub>x</sub>, and CO emissions limitations for P115 and P117 pursuant to OAC rule 3745-31-05(A)(3) above is specified in the "Testing Requirements", section f), of this permit.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas as fuel in these emissions units.

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 the fuel burned in each emissions unit.
- (2) Records shall be maintained of the total annual amount of natural gas burned in each emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify, at a minimum, each day when a fuel other than natural gas was burned in each emissions unit
- (2) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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:

Particulate emissions less than 10 microns in diameter (PM<sub>10</sub>) shall not exceed 0.020 lbs/mmBtu and 1.14 tons/yr.

Applicable Compliance Method:

The lb/mmBtu emissions limitation was provided by the facility in their permit application for the original PTI 15-0144 issued 12/21/1981 for these emissions units.

The ton per year emissions limitation of each emissions unit was developed by multiplying the lb PM<sub>10</sub>/mmBtu emissions limitation by the rated heat input of each emissions unit (in mmBtu/hr) times the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, compliance with the lb/mmBtu emissions limitation demonstrates compliance with the annual emissions limitations.



Compliance with the individual PM<sub>10</sub> emissions limitation of 0.020 lb PM<sub>10</sub>/mmBtu from emissions unit P115 or P117 exhausting to meltshop baghouse (BHC-1) is assumed provided compliance with the combined PM<sub>10</sub> emissions limitation from the baghouse of 0.076 lb PM<sub>10</sub>/ton molten steel is demonstrated by stack testing of the baghouse exhaust gases in accordance with the procedure set forth for testing of the EAF (P102) in the facility's TV permit.

b. Emission Limitation:

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.50 lb/mmBtu and 28.47 tons/yr.

Applicable Compliance Method:

The lb/mmBtu emissions limitation was provided by the facility in their permit application for the original PTI 15-0144 issued 12/21/1981 for these emissions units.

The ton per year emissions limitation of each emissions unit was developed by multiplying the lb NO<sub>x</sub> /mmBtu emissions limitation by the rated heat input of each emissions unit (in mmBtu/hr) times the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, compliance with the lb/mmBtu emissions limitation demonstrates compliance with the annual emissions limitations.

Compliance with the individual NO<sub>x</sub> emissions limitation of 0.50 lb NO<sub>x</sub>/mmBtu from emissions unit P115 or P117 exhausting to meltshop baghouse (BHC-1) is assumed provided compliance with the combined NO<sub>x</sub> emissions limitation from the baghouse of 0.20 lb NO<sub>x</sub>/ton molten steel is demonstrated by stack testing of the baghouse exhaust gases in accordance with the procedure set forth for testing of the EAF (P102) in the facility's TV permit.

c. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.04 lb/mmBtu and 2.28 tons/yr.

Applicable Compliance Method:

The lb/mmBtu emissions limitation was provided by the facility in their permit application for the original PTI 15-0144 issued 12/21/1981 for these emissions units.

The ton per year emissions limitation of each emissions unit was developed by multiplying the lb CO/mmBtu emissions limitation by the rated heat input of each emissions unit (in mmBtu/hr) times the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, compliance with the lb/mmBtu emissions limitation demonstrates compliance with the annual emissions limitation.



Compliance with the individual CO emissions limitation of 0.04 lb CO/mmBtu from emissions unit P115 or P117 exhausting to meltshop baghouse (BHC-1) is assumed provided compliance with the combined CO emissions limitation from the baghouse of 3.5 lb CO/ton molten steel is demonstrated by stack testing of the baghouse exhaust gases in accordance with the procedure set forth for testing of the EAF (P102) in the facility's TV permit.

g) Miscellaneous Requirements

- (1) None.

**5. Emissions Unit Group -Soaking Pits 1-4 and 5-8: P104,P105,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P104	Soaking Pits #1-#4 to heat steel ingots, rated at 80 mmBtu/hr (20 mmBtu/hr each) firing natural gas
P105	Soaking Pits #5-#8 to heat steel ingots, rated at 80 mmBtu/hr (20 mmBtu/hr each) firing 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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)  (Supersedes PTI 15-0144 issued 7/19/1995)  [Administrative modification to Best Available Technology (BAT) Determination to account for deletion of oil firing and reduction in maximum fuel input. Also clarifies that all particulate emissions are assumed to be PM <sub>10</sub> ]	Particulate emissions less than 10 microns in diameter (PM <sub>10</sub> ) shall not exceed 0.015 lb/mmBtu and 5.26 tons/year.  Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.0006 lb/mmBtu and 0.21 tons/year.  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 0.50 lb/mmBtu and 175.20 tons/year.  Carbon monoxide (CO) emissions shall not exceed 0.04 lb/mmBtu and 14.02 tons/year.  See b)(2)a., b)(2)b., b)(2)c., b)(2)d., and c)(1).
b.	OAC rule 3745-17-07(A)(1)	Exempt. See b)(2)e.
c.	OAC rule 3745-17-11	Exempt. See b)(2)f.
d.	OAC rule 3745-17-10	Exempt. See b)(2)g.
e.	OAC rule 3745-18-06(E) OAC rule 3745-18-82(A)	Exempt. See b)(2)h

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas firing only and compliance with the terms and conditions of this permit.
- b. All particulate emissions are generated from natural gas combustion and are assumed to be less than 10 microns in diameter (designated as PM<sub>10</sub>).
- c. The uncontrolled potential emissions of VOC when firing natural gas in these emissions units is negligible (less than 10 pounds per day each), and therefore emissions limits for this pollutant have not been established.
- d. The emissions limitations for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, and CO are based on each emission unit's potential to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.
- e. These emissions units are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions units are not subject to the requirements of OAC rule 3745-17-11.
- f. The burning of natural gas is the only source of particulate emissions from these emissions units. The uncontrolled mass rate of particulate emissions from each 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 pursuant to OAC rule 3745-17-11(A)(4) because the process weight that causes any emissions of particulate matter is equal to zero.
- g. These emissions units are designed such that the products of combustion come into direct contact with materials being processed and therefore do not meet the definition of "fuel burning equipment" given in OAC rules 3745-17-01(B)(5) and 3745-18-01(B)(4). They are, therefore, exempt from the emission limitations and control requirements contained in OAC rule 3745-17-10 for fuel burning equipment and subject to the requirements in OAC rule 3745-18-06 as process equipment.
- h. The burning of natural gas is the only source of sulfur dioxide from these emissions units. Pursuant to OAC rule 3745-18-06(C), these emissions units are exempt from OAC rules 3745-18-06(E) and 3745-18-82 because the process weight input (excludes gaseous fuels) that causes any emissions of sulfur dioxide is equal to zero, which is less than 1,000 lbs/hour.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in these emissions units.

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 the fuel burned in the emissions units.
- (2) Records shall be maintained of the total annual amount of natural gas burned in these emissions units.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify, at a minimum, each day when a fuel other than natural gas was burned in these emissions units
- (2) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the emissions limitations and/or control requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Particulate emissions less than 10 microns in diameter (PM<sub>10</sub>) shall not exceed 0.015 lb/mmBtu and 5.26 tons/year.

Applicable Compliance Method:

A 0.02 lb/mmBtu emissions limitation for particulate emissions was provided by the facility in their permit application for the original PTI 15-0144 issued 12/21/1981 for these emissions units. However, this was based on oil firing which has been eliminated.

The 0.015 lb/mmBtu emissions limitation was established by dividing the particulate emissions factor of 7.6 lb/10<sup>6</sup> scf for natural gas combustion from AP-42, "Compilation of Air Pollutant Emission Factors", 5<sup>th</sup> Edition, Section 1.4, Table 1.4-2 (07/98) by the natural gas heating value of 1020 Btu/scf. The resulting emissions factor (EF) was increased by a 100% margin to account for the "D" rating assigned to the EF by AP-42..

The ton per year emission limitation was developed by multiplying the lb/mmBtu emission limitation by the rated heat input of 80 mmBtu/hr times the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, compliance with the lb/mmBtu emission limitation demonstrates compliance with the annual emission limitation.



If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emissions testing performed in accordance with 40 CFR Part 51, Appendix M, Method 201 or 201A. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

b. Emission Limitation:

Nitrogen oxides (NOx) emissions shall not exceed 0.50 lb/mmBtu and 175.20 tons/year.

Applicable Compliance Method:

The lb/mmBtu emissions limitation was provided by the facility in their permit application for their modified PTI 15-0144 issued 01/10/1990 for this emissions unit. This limitation was retained, even with the elimination of oil firing, since it is still representative of NOx emissions from natural gas in the very hot combustion zone of the soak pits.

The ton per year emission limitation was developed by multiplying the lb/mmBtu emission limitation by the rated heat input of 80 mmBtu/hr times the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the lb/mmBtu allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 7 or 7E. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

c. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.04 lb/mmBtu and 14.02 tons/year.

Applicable Compliance Method:

The lb/mmBtu emissions limitation was provided by the facility in their permit application for their original PTI 15-0144 issued 12/21/1981 for this emissions unit. This limitation was retained, even with the elimination of oil firing, since it is still representative of CO emissions from natural gas in the very hot combustion zone of the soak pits.

The ton per year emission limitation was developed by multiplying the lb/mmBtu emission limitation by the rated heat input of 80 mmBtu/hr times the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the lb/mmBtu allowable emission limitation, compliance shall also be shown with the annual emission limitation.



If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division

d. Emission Limitation:

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.0006 lb/mmBtu and 0.21 tons/year.

Applicable Compliance Method:

A 0.55 lb/mmBtu emissions limitation for particulate emissions was provided by the facility in their permit application for the original PTI 15-0144 issued 12/21/1981 for these emissions units. However, this was based on oil firing which has been eliminated.

The lb/mmBtu emissions limitation was established by converting the 0.6 lb/mmscf emission factor for SO<sub>2</sub> from natural gas combustion from AP-42 "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (07/98) by dividing the factor with the heat content referenced in that table as shown below.

$$(0.6 \text{ lb/mmscf}) / (1020 \text{ Btu/scf}) = 0.0006 \text{ lb/mmBtu.}$$

The ton per year emission limitation was developed by multiplying the lb/mmBtu emission limitation by the rated heat input of 80 mmBtu/hr times the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the lb/mmBtu allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division

- (2) The permittee shall conduct, or have conducted, emission testing for Emissions Unit P104 in accordance with the following requirements. The results of the testing for P104 shall be considered representative of the emissions from P105, which is an identical unit:
- a. The emissions testing shall be conducted within the time schedule specified in the facility's Title V permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NO<sub>x</sub> and CO, in the appropriate averaging period(s).

- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates:
  - i. for NO<sub>x</sub>, Method 7 or 7E of 40 CFR Part 60, Appendix A; and
  - ii. for CO, Method 10 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

- d. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.
- e. The weight of steel processed in each soak pit shall be monitored and recorded for each test-run.
- f. The total natural gas fired in each soak pit for each test-run shall be recorded and at least one sample of the natural gas fired during the 3 test-runs shall be collected and analyzed to determine its heating value in Btu/scf.
- g. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test(s) may result in the Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).
- h. Personnel from the Canton City Health Department, Air Pollution Control Division shall be permitted to witness the test, 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.



i. 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 Canton City Health Department, Air Pollution Control Division 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 Canton City Health Department, Air Pollution Control Division.

g) Miscellaneous Requirements

(1) None.

**6. Emissions Unit Group -Soaking Pits 11 and 12: P123,P124,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P123	Soaking Pit #12 to heat steel ingots rated at 20 mmBtu/hr, equipped with oxyfuel (oxygen-enriched natural gas) fired burners, and vented through stack P123S-1.
P124	Soaking Pit #11 to heat steel ingots rated at 20 mmBtu/hr, equipped with oxyfuel (oxygen-enriched natural gas) fired burners, and vented through stack P124S-1.

- 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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)  (Supersedes PTI 15-1157 issued 11/30/1994 for P123)  (Supersedes PTI 15-1162 issued 11/1/1995 for P124)  [Administrative modification to Best Available Technology (BAT) determination to increase allowable emissions restrictions to account for increased maximum fuel input rating of the EUs. Also clarifies that all particulate emissions are assumed to be PM <sub>10</sub> ]	PM <sub>10</sub> emissions shall not exceed 0.130 lbs/hr and 0.569 tons/yr. See b)(2)h.  Volatile organic compound (VOC) emissions shall not exceed 0.122 lb/hr and 0.534 tons/yr  Nitrogen oxides (NOx) emissions shall not exceed 2.940 lbs/hr and 12.877 tons/yr.  Carbon monoxide (CO) emissions shall not exceed 0.740 lb/hr and 3.241 tons/yr.  See b)(2)a., b)(2)b., b)(2)c., and c)(1).
b.	OAC rule 3745-17-07(A)(1)	Exempt. See b)(2)d.
c.	OAC rule 3745-17-11	Exempt. See b)(2)e.
d.	OAC rule 3745-17-10	Exempt. See b)(2)f.
e.	OAC rule 3745-18-06(E) OAC rule 3745-18-82(A)	Exempt. See b)(2)f. and b)(2)g.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of oxyfuel (oxygen-enriched natural gas) firing only and compliance with the terms and conditions of this permit.
- b. The emissions limitations for PM<sub>10</sub>, VOC, NO<sub>x</sub>, and CO are based on each emission unit's potential to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emissions limitations.
- c. The uncontrolled potential emissions of sulfur dioxide (SO<sub>2</sub>) when firing oxyfuel in these emissions units is negligible (less than 10 pounds per day each), and therefore emissions limits for this pollutant have not been established.
- d. These emissions units are exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions units are not subject to the requirements of OAC rule 3745-17-11.
- e. The burning of oxyfuel is the only source of particulate emissions from these emissions units. The uncontrolled mass rate of particulate emissions from each 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 pursuant to OAC rule 3745-17-11(A)(4) because the process weight that causes any emissions of particulate matter is equal to zero.
- f. These emissions units are designed such that the products of combustion come into direct contact with materials being processed and therefore do not meet the definition of "fuel burning equipment" given in OAC rules 3745-17-01(B)(5) and 3745-18-01(B)(4). They are, therefore, exempt from the emission limitations and control requirements contained in OAC rule 3745-17-10 for fuel burning equipment and subject to the requirements in OAC rule 3745-18-06 as process equipment.
- g. The burning of oxyfuel is the only source of sulfur dioxide from these emissions units. Pursuant to OAC rule 3745-18-06(C), these emissions units are exempt from OAC rules 3745-18-06(E) and 3745-18-82 because the process weight input (excludes gaseous fuels) that causes any emissions of sulfur dioxide is equal to zero, which is less than 1,000 lbs/hour.
- h. All particulate emissions are assumed to be less than 10 microns in diameter and are designated as PM<sub>10</sub>.

c) Operational Restrictions

- (1) The permittee shall burn only oxyfuel (oxygen-enriched natural gas) as fuel in these emissions units.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than oxyfuel, the permittee shall maintain a record of the type and quantity of the fuel burned in the emissions units.
- (2) Records shall be maintained of the total annual amount of oxyfuel burned in these emissions units.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify, at a minimum, each day when a fuel other than oxyfuel was burned in these emissions units.
- (2) All reports shall be submitted in accordance with the reporting requirements of Part A: Standard Terms and Conditions of this permit. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the emission limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Filterable PM<sub>10</sub> emissions shall not exceed 0.130 lbs/hr and 0.569 tons/yr.

Applicable Compliance Method:

The hourly emissions limitation was established by multiplying the facility provided emissions factor of 0.0065 lb PM<sub>10</sub>/mmBtu of heat input by the maximum heat input of 20 mmBtu/hr. The facility provided the emissions factor in the application for the original PTI 15-1157 issued 11/30/1994 for P123 and PTI 15-1162 issued 01/25/1995 for P124. Note: Oxyfuel is about 100% oxygen-enriched natural gas.

The ton per year emission limitation was developed by multiplying the short-term allowable PM<sub>10</sub> emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, the permittee shall demonstrate compliance with the hourly emissions limitation through emissions testing performed in accordance with 40 CFR Part 51, Appendix M, Method 201 or 201A. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

b. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.122 lb/hr and 0.534 tons/yr.

Applicable Compliance Method:

The hourly emissions limitation was established by multiplying the facility provided emissions factor of 0.0061 lb VOC/mmBtu of heat input by the maximum heat input of 20 mmBtu/hr. The facility provided the emissions factor in the application for the original PTI 15-1157 issued 11/30/1994 for P123 and PTI 15-1162 issued 01/25/1995 for P124. Note: Oxyfuel is about 100% oxygen-enriched natural gas.

The ton per year emission limitation was developed by multiplying the short-term allowable VOC emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, the permittee shall demonstrate compliance with the hourly emissions limitation through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

c. Emission Limitation:

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 2.940 lbs/hr and 12.877 tons/yr.

Applicable Compliance Method:

The hourly emissions limitation was established by multiplying the facility provided emissions factor of 0.147 lb NO<sub>x</sub>/mmBtu of heat input by the maximum heat input of 20 mmBtu/hr. The facility provided the emissions factor in the application for the original PTI 15-1157 issued 11/30/1994 for P123 and PTI 15-1162 issued 01/25/1995 for P124. Note: Oxyfuel is about 100% oxygen-enriched natural gas.

The ton per year emission limitation was developed by multiplying the short-term allowable NO<sub>x</sub> emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, the permittee shall demonstrate compliance with the hourly emissions limitation through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Method 7 or 7E. Alternative U.S. EPA approved test methods



may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

d. Emission Limitation:

Carbon monoxide (CO) emissions shall not exceed 0.740 lb/hr and 3.241 tons/yr.

Applicable Compliance Method:

The hourly emissions limitation was established by multiplying the facility provided emissions factor of 0.037 lb CO/mmBtu of heat input by the maximum heat input of 20 mmBtu/hr. The facility provided the emissions factor in the application for the original PTI 15-1157 issued 11/30/1994 for P123 and PTI 15-1162 issued 01/25/1995 for P124. Note: Oxyfuel is about 100% oxygen-enriched natural gas.

The ton per year emission limitation was developed by multiplying the short-term allowable CO emission limitation by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

If required, the permittee shall demonstrate compliance with the hourly emissions limitation through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

(2) The permittee shall conduct, or have conducted, emission testing for Emissions Unit P123 in accordance with the following requirements. The results of the testing for P123 shall be considered representative of the emissions from P124, which is an identical unit:

- a. The emissions testing shall be conducted within the time schedule specified in the facility's Title V permit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NO<sub>x</sub> and CO, in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates:
  - i. for NO<sub>x</sub>, Method 7 of 40 CFR Part 60, Appendix A; and
  - ii. for CO, Method 10 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Canton City Health Department, Air Pollution Control Division.

d. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the appropriate Ohio EPA District

Office or local air agency. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the appropriate Ohio EPA District Office or local air agency that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.

- e. The weight of steel processed in each soak pit shall be monitored and recorded for each test-run.
- f. The total oxyfuel fired in each soak pit for each test-run shall be recorded and at least one sample of the natural gas fired during the 3 test-runs shall be collected and analyzed to determine its heating value in Btu/scf.
- g. Not later than 30 days prior to the proposed test date, the permittee shall submit an "Intent to Test" notification to the Canton City Health Department, Air Pollution Control Division. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test and the persons who will be conducting the test. Failure to submit such notification for review and approval prior to the test(s) may result in the Canton City Health Department, Air Pollution Control Division's refusal to accept the results of the emission test(s).
- h. Personnel from the Canton City Health Department, Air Pollution Control Division shall be permitted to witness the test, 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.
- i. 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 Canton City Health Department, Air Pollution Control Division 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 Canton City Health Department, Air Pollution Control Division.

g) Miscellaneous Requirements

- (1) None.