



State of Ohio Environmental Protection Agency

S.E.D.O.

STREET ADDRESS:

1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 691-2329

MAILING ADDRESS:

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

02 MAR 30 AM 11:31

Re: Permit to Install
Coshocton County
Application No: 06-5366

CERTIFIED MAIL

March 25, 1998

ARMCO INC - COSHOCTON OPERATIONS
MELVIN HAZZARD
17400 STATE ROUTE 16
COSHOCTON, OH 43812

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

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

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

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

Very truly yours,

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

cc: US EPA
SOUTHEAST DISTRICT OFFICE, DAPC

George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director



Permit to Install Terms and Conditions

Application No. 06-5366
APS Premise No. 0616010039
Permit Fee: \$1600.00

Name of Facility: ARMCO INC - COSHOCTON OPERATIONS

Person to Contact: MELVIN HAZZARD

Address: 17400 STATE ROUTE 16
COSHOCTON, OH 43812

Location of proposed source(s): 17400 STATE ROUTE 16
COSHOCTON, OHIO

Description of proposed source(s):
MOLTEN SALT BATH AND RINSE TANK WITH SCRUBBER.

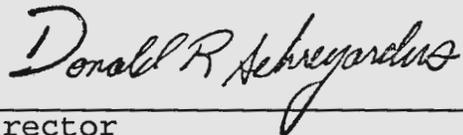
Date of Issuance: March 25, 1998

Effective Date: March 25, 1998

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

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

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

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

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

AIR EMISSION SUMMARY

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

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P029	Molten salt bath and rinse tank	Compliance with the specified allowable emission limitations and specified OAC rules through the use of a scrubber; recordkeeping and reporting requirements	3745-31-05 3745-17-07 (A) (1) (b)	3.0 pounds PM/hour 13.14 TPY PM Visible particulate emissions from any stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average at any time.
			3745-17-11	BAT determination more stringent

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	13.14

CONSTRUCTION STATUS

The OEPA Southeast District Office - DAPC shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were

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placed into operation for the following sources: P029 Molten Salt Bath and Rinse Tank.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Southeast District Office - DAPC, 2195 Front Street, Logan, Ohio 43138.

WASTE DISPOSAL

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Southeast District Office - DAPC, 2195 Front Street, Logan, Ohio 43138.

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

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

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

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Scrubber Operational Restrictions

1. The pressure loss across the scrubber media shall be maintained within the range of 0 to 3 inches of water while the emissions unit is in operation.
2. The recirculation flow rate across the media shall be maintained within a range of 120 to 150 gallons per minute.

B. Monitoring and Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure loss and recirculation flow rate across the scrubber media while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).
2. The permittee shall record the pressure loss and recirculation flow rate across the scrubber media on a daily basis.
3. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

C. Reporting Requirements

1. The permittee shall submit quarterly written reports of:
 - a. any deviations (excursions) from emissions 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 Ohio EPA, Southeast District Office.

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

D. Compliance Methods

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

- a. Emission Limitation

- 3.0 pounds PM/hour

- Applicable Compliance Method

- Compliance shall be determined by multiplying the amount of salt used by factor of 1 minus a scrubber control efficiency of 95 percent (1-0.95), resulting in a maximum controlled emission rate. If required, compliance with the particulate matter emissions limit shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03.

- b. Emission Limitation

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

- Applicable Compliance Method

- If required, compliance with the visible emissions limitations shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.