



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

10/26/2016

Mr. Trevor Beers
 Nucor Steel Marion, Inc.
 912 Cheney Avenue
 Marion, OH 43301-1801

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0351010017
 Permit Number: P0121655
 Permit Type: Administrative Modification
 County: Marion

Certified Mail

No	TOXIC REVIEW
Yes	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	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

How to give us feedback on your permitting experience

Please complete a survey at 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 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 Ohio EPA DAPC, Northwest District Office at (419)352-8461 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
Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Nucor Steel Marion, Inc.**

Facility ID:	0351010017
Permit Number:	P0121655
Permit Type:	Administrative Modification
Issued:	10/26/2016
Effective:	10/26/2016



Division of Air Pollution Control
Permit-to-Install
for
Nucor Steel Marion, Inc.

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Final Permit-to-Install
Nucor Steel Marion, Inc.
Permit Number: P0121655
Facility ID: 0351010017
Effective Date: 10/26/2016

Authorization

Facility ID: 0351010017
Facility Description: Steel Mill
Application Number(s): A0056857
Permit Number: P0121655
Permit Description: Administrative Modification to permit a dust handling system as an individual unit subject to NSPS which had previously been associated with the melt shop.
Permit Type: Administrative Modification
Permit Fee: \$100.00
Issue Date: 10/26/2016
Effective Date: 10/26/2016

This document constitutes issuance to:

Nucor Steel Marion, Inc.
912 Cheney Avenue
Marion, OH 43301-1801

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

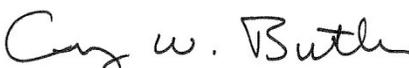
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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



Final Permit-to-Install
Nucor Steel Marion, Inc.
Permit Number: P0121655
Facility ID: 0351010017
Effective Date: 10/26/2016

Authorization (continued)

Permit Number: P0121655

Permit Description: Administrative Modification to permit a dust handling system as an individual unit subject to NSPS which had previously been associated with the melt shop.

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

Emissions Unit ID:	P033
Company Equipment ID:	P905
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Nucor Steel Marion, Inc.
Permit Number: P0121655
Facility ID: 0351010017
Effective Date: 10/26/2016

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 Ohio EPA DAPC, Northwest District Office.

- (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 Ohio EPA DAPC, Northwest District Office. 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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 Ohio EPA DAPC, Northwest District Office.
- 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 Ohio EPA DAPC, Northwest 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, 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
Nucor Steel Marion, Inc.
Permit Number: P0121655
Facility ID: 0351010017
Effective Date: 10/26/2016

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Nucor Steel Marion, Inc.
Permit Number: P0121655
Facility ID: 0351010017
Effective Date: 10/26/2016

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.



Final Permit-to-Install
Nucor Steel Marion, Inc.
Permit Number: P0121655
Facility ID: 0351010017
Effective Date: 10/26/2016

C. Emissions Unit Terms and Conditions

1. P033

Operations, Property and/or Equipment Description:

Dust Handling System

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 rules 3745-31-10 through 3745-31-20	Combined meltshop emission limitations* for emissions units P004, P005, P007, P012, P013, P014, P015, P033 and P903: Particulate matter 10 microns or less in size (PM10): 0.0052 gr/dscf and 115.63 tons per rolling, 12-month period Particulate matter 2.5 microns or less in size (PM2.5): 0.0049 gr/dscf and 108.96 tons per rolling, 12-month period See b)(2)a.
b.	ORC 3704.03(T)	See b)(2)b.
c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)d.
e.	40 CFR Part 60, Subpart AAa	Visible PE limitation [See b)(2)e. and b)(2)f.]

*The combined limitations shall be based on meltshop emissions from 2 stacks - the stack of the baghouse control system serving the meltshop operations and a stack serving emissions units P013 and P014 which exhausts directly to the atmosphere.

(2) Additional Terms and Conditions

a. The permittee shall employ Best Available Control Technology (BACT) for emissions of PM10 and PM2.5 from meltshop operations (emissions units P004, P005, P007, P012, P013, P014, P015, P033 and P903). BACT has been determined to be the following:

Pollutant	BACT Requirements
PM10 PM2.5	Direct-shell evacuation control (DEC) vented to baghouse for EAF (emissions unit P903)
	Maximum outlet concentration(s) from the baghouse of: 0.0049 gr PM2.5/dscf; and 0.0052 gr PM10/dscf.
	Visible PE from the baghouse stack serving the meltshop shall not exhibit 3 percent (3%) opacity or greater, as a six-minute average

The maximum outlet concentrations and emission standards presented in the table above apply to the combined emissions from all meltshop operations. Compliance with the combined limitations shall be based on meltshop emissions from the stack of the baghouse control system serving the meltshop operations and the stack serving emissions units P013 and P014 which exhausts directly to the atmosphere.

- b. The Best Available Technology (BAT) requirements under ORC 3704.03(T) have been determined to be compliance with the gr/dscf emission limitation for PM10 established pursuant to OAC rules 3745-31-10 through 3745-31-20.

It should be noted that all emissions of particulate matter are PM10. PM10 emissions are inclusive of PM2.5.

This emissions unit also has PM10 and PM2.5 emissions from an associated silo bin vent as part of the dust handling system. These emissions have been determined to be negligible and will therefore not be included in this permit.

- c. The emission limitation specified by this rule is less stringent than the PM10 emission limitation established for meltshop operations pursuant to OAC rules 3745-31-10 through 3745-31-20.
- d. The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rules 3745-31-10 through 3745-31-20.
- e. No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from the dust-handling system any gases that exhibit 10 percent (10%) opacity or greater.

The allowed opacity of 10% only applies to the dust-handling system as defined in 40 CFR 60.271a.

“equipment used to handle particulate matter collected by the control device for an electric arc furnace or AOD vessel subject to this subpart. For the purposes of this subpart, the dust-handling system shall consist of the control device dust hoppers, the dust-conveying equipment, any central dust storage equipment, the dust-treating equipment (e.g., pug mill, pelletizer), dust transfer equipment (from

storage to truck), and any secondary control devices used with the dust transfer equipment.”

Any visible PE that would be generated by equipment, devices, etc. (i.e. dust accumulation in the building structure for the dust-handling system) that do not come under the definition of a dust-handling system are not covered under the 10% opacity restriction. This emissions unit is only allowed particulate matter emissions associated with a dust-handling system as defined in 40 CFR 60.271a.

- f. Emission limitations associated with the melt shop baghouse in 40 CFR, Part 60, Subpart AAa are less stringent than the BACT emission limitations listed in OAC rules 3745-31-10 through 3745-31-20.

The silo bin vent associated with this emission unit is subject to the opacity listed above from 40 CFR, Part 60, Subpart AAa.

- g. PM10 and PM 2.5 emissions from the meltshop baghouse for emission units P004, P005, P007, P012, P013, P014, P015, P033 and P903 have previously been accounted for in PTI #P0110186 and Title V #P0112447. This Administrative Modification seeks to permit emissions from the silo bin vent associated with the dust handling system.

c) Operational Restrictions

- (1) The permittee shall maintain, at the appropriate levels established during the most recent emission test that demonstrated that the emissions unit was compliance, either:
 - a. The control system fan motor amperes and all damper positions; or
 - b. The volumetric flow rate through each separately ducted hood; or
 - c. The volumetric flow rate at the control device inlet and all damper positions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall monitor the visible emissions from the baghouse(s) controlling these emissions units. Observations of the opacity of the visible emissions from these control devices shall be performed by a certified visible emission observer as follows:
 - a. The permittee shall conduct visible emission observations on each control device in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.
 - b. Visible emission observations shall be conducted at least once per day when the furnace is operating in the melting and refining period. These observations shall be taken in accordance with Method 9 for a least three 6-minute periods.
 - c. The opacities shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6-minute observations shall be required. In this case, Method 9 observations must

be made for the site of highest opacity that directly relates to the cause or location of visible emissions observed during a single incident.

- d. The permittee shall ensure that an adequate number of personnel on site are "certified" to conduct visible emission observations in accordance with Method 9 procedures. The permittee may choose to have visible emissions observations contracted out, i.e. "certified" personnel may be provided by another company.
 - e. The permittee shall maintain copies of all daily opacity observations required above. The records shall identify the persons responsible for conducting the readings and verification that their Method 9 certifications are up-to-date.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the silo bin vent serving the dust handling system. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall either:
- a. Check and record the control system fan motor amperes and damper position on a once-per-shift basis; or
 - b. Install, calibrate, operate, and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or
 - c. Install, calibrate, operate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and check and record damper positions on a once-per-shift basis.

The monitoring device(s) may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result. The flow rate monitoring devices shall have an accuracy of +/- 10 percent (10%) over their normal operating range and shall be calibrated according to the manufacturer's instructions. The permittee may be required to demonstrate the accuracy of the monitoring devices relative to Methods 1 and 2 of Appendix A or 40 CFR, Part 60.

- (4) The requirements in 40 CFR 60.273a – Emission monitoring and 40 CFR 60.274a – Monitoring of operations from 40 CFR Part 60 Subpart AAa are appropriate and

sufficient for demonstrating on-going compliance with the BACT requirements established in accordance with OAC rules 3745-31-10 through 3745-31-20.

- (5) At a minimum, the permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture system (i.e., pressure sensors, dampers, and damper switches). This inspection shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion). Any deficiencies shall be noted and proper maintenance performed.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the visible PE limitation from the baghouse stack;
 - b. all periods of time (including the date) in which the permittee did not initiate investigation of the bag leak detection system within 1 hour of the first discovery of the alarming incident for possible corrective action; and
 - c. all periods of time (including the date) in which the permittee did not initiate corrective actions, if needed, within 3 hours of an alarm from the bag leak detection system.
 - d. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
- (2) The permittee shall submit semiannual reports that either:
 - a. identify operation of control system fan motor amperes at values exceeding +/- 15 percent (15%) of the value established during the most recent compliance test; or
 - b. identify operation at volumetric flow rates through each separately ducted hood exceeding values +/- 10 percent (10%) of the value established during the most recent compliance test; or
 - c. identify operation at volumetric flow rates at the control device inlet exceeding values +/- 10 percent (10%) of the value established during the most recent compliance test.
- (3) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the silo bin vent serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

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

a. Emission Limitations:

0.0052 gr PM10/dscf; and
0.0049 gr PM2.5/dscf;

Applicable Compliance Method:

The emission limitations above were established as BACT for meltshop operations. If required, PM2.5/PM10 testing shall be performed using Methods 1-4 of 40 CFR, Part 60 and 201/201A and 202 of 40 CFR Part 51, Appendix M.

b. Emission Limitation:

Visible PE from the baghouse serving the melt shop shall not exhibit 3 percent (3%) opacity or greater, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9, as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and the monitoring and recordkeeping requirements in this permit [See d)(1)].

c. Emission Limitation:

115.63 tons PM10 per rolling, 12-month period; and
108.96 tons PM2.5 per rolling, 12-month period

Applicable Compliance Method

The annual emission limitations were established by multiplying the 0.0052 grain PM10/dscf and 0.0049 gr PM2.5/dscf limitations by the maximum volumetric air flow rate from the melt shop baghouse (592,288 dscfm), and by using the following conversion factors in order to convert to tons per 12-month period: 1 pound/7,000 grains, 60 minutes/hour, 8,760 hours/year, and 1 ton/2,000 pounds. Therefore, provided compliance is demonstrated with the 0.0052 gr PM10/dscf and 0.0049 gr PM2.5/dscf limitations, compliance with the annual emission limitations shall be demonstrated.

d. Emission Limitation:

Visible PE from the bin vent serving the dust silo at the dust handling system shall not exhibit 10 percent (10%) opacity or greater, as a six-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A and the procedures specified in 40 CFR, Part 60, Subpart AAa [See f)(2)].

- (2) The permittee shall conduct, or have conducted, emission testing for all of the affected facilities associated with this emissions unit that are subject to 40 CFR, Part 60, Subpart AAa.
- a. Testing shall be conducted in accordance with the provisions of 40 CFR, Part 60, Subpart A, section 60.8 and 40 CFR, Part 60, Subpart AAa, section 60.275a.
 - b. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, by no later than 180 days after initial startup of such facility and at such other times as may be required by the Ohio Environmental Protection Agency, Division of Air Pollution Control.
 - c. The emission testing shall be conducted to demonstrate compliance with the following emission limitations:
 - i. No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from the dust-handling system any gases that:
 - (a) exhibit 10 percent (10%) opacity or greater
 - d. The permittee shall determine compliance with the particulate matter standards in 40 CFR 60.275a [See f)(2)c. for emission limitations] as follows:
 - i. Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity.
 - e. 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



- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- g) Miscellaneous Requirements
- (1) None.