

Facility ID: 1409010083 Issuance type: Draft State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1409010083 Emissions Unit ID: P901 Issuance type: Draft State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Oxygen Lancing Station with Baghouse	OAC 3745-17-07(A)	Less than or equal to 20 percent opacity, as a six-minute average, for the exhaust gases from the baghouse stack, except as provided by rule.
-	OAC 3745-17-07(B)	Less than or equal to 20 percent opacity, as a three-minute average, for any fugitive dust emissions.
-	OAC 3745-17-08(B)(3)	0.030 grain of PM/dscf for the exhaust gases from the baghouse.

**2. Additional Terms and Conditions**

- (a) The particulate emissions discharged from the baghouse shall not exceed the following: 10.5 lbs/hr and 26.3 TPY.  
 The emissions of fugitive dust shall not exceed the following: 16.8 lbs/hr and 6.1 TPY.  
 The oxygen lancing operation shall be adequately enclosed and vented to a baghouse, except when oxygen lancing steel pieces that exceed the design dimensions of the enclosure hoods. The enclosure hoods shall be sufficient to eliminate visible emissions of fugitive dust to the extent possible with good engineering design.

**B. Operational Restrictions**

1. The maximum annual operating hours for this emissions unit shall not exceed 5000 hours, based upon a rolling twelve-month summation of the operating hours. To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

Month Maximum Allowable - Cumulative Operating Hours
1-5 2500
1-6 2917
1-7 3333
1-8 3750
1-9 4167
1-10 4583
1-11 5000
1-12 5000

After the first twelve calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, twelve-month summation of the operating hours.

2. The oxygen lancing of steel pieces that exceed the design dimensions of the enclosure hoods shall not be performed for more than 500 hours per year, based upon a rolling twelve-month summation of the operating hours. To ensure federal enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

## Month Maximum Allowable

- Cumulative Operating Hours

1-5 250  
 1-6 292  
 1-7 333  
 1-8 375  
 1-9 417  
 1-10 458  
 1-11 500  
 1-12 500

After the first twelve calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, twelve-month summation of the operating hours.

3. The pressure drop across the baghouse shall be maintained within the range of 3 to 6 inches of water, during use of the enclosure hoods and baghouse, while the emissions unit is in operation.

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

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse 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). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall maintain monthly records of the total hours of operation of the emissions unit and the hours of operation during which the steel pieces oxygen-lanced exceeded the design dimensions of the enclosure. After the first twelve calendar months of operation following the issuance of this permit, the permittee shall also record the rolling twelve-month summation of the total hours of operation of the emissions unit for each month and the rolling twelve-month summation of the total hours of operation for each month during which the steel pieces oxygen-lanced exceeded the design dimensions of the enclosure.
3. The permittee also shall record each hour and day that the oxygen lancing operation did not employ the enclosure hoods and baghouse, along with the length, width and size of the steel piece oxygen-lanced without the use of the enclosure hoods and baghouse.

**D. Reporting Requirements**

1. The permittee shall submit semi-annual pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These semi-annual reports shall be submitted by January 30 and July 30 of each year and shall cover the previous six calendar months.
2. The permittee shall submit semi-annual reports indicating any exceedances of the above-mentioned hours of operation limits (rolling, twelve-month summations), along with the cause of the exceedance and corrective action taken to prevent further exceedances. Also, for the first twelve calendar months of operation following the issuance of this permit, the semi-annual reports shall include the total hours of operation during each calendar month and the total hours that the oxygen lancing operation did not employ the enclosure hoods and baghouse. After the first twelve calendar months of operation following the issuance of this permit, the semi-annual reports shall include the rolling twelve-month total hours of operation summations and the rolling twelve-month hours of operation summation during which the oxygen lancing operation did not employ the enclosure hoods and baghouse. These semi-annual reports shall be submitted by January 30 and July 30 of each year and shall cover the previous six calendar months.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
- a. Compliance with the opacity limit for the baghouse stack shall be demonstrated by the methods outlined in OAC 3745-17-03(B)(1);
- b. Compliance with the opacity limit for the fugitive particulate emissions shall be demonstrated by the methods outlined in OAC 3745-17-03(B)(3);
- c. Compliance with the allowable grains of PM/dscf and lbs/hr of PM emissions rates shall be determined by Method 5 of 40 CFR Part 60, Appendix A;
- d. Compliance with the hourly fugitive particulate emission limitation shall be demonstrated by completing the following equations and adding the results:
- (i) tons of steel oxygen-lanced outside the enclosure hoods per hour times 2.8 lbs PM/ ton of steel oxygen-lanced; plus
- (ii) tons of steel oxygen-lanced inside the enclosure hoods per hour while the baghouse is in operation times 2.8 lbs PM/ ton of steel oxygen-lanced, times 0.05;
- e. Compliance with the annual fugitive particulate emission limitation shall be demonstrated by completing the following equations and adding the results:
- (i) tons of steel oxygen-lanced outside the enclosure hoods per year times 2.8 lbs PM/ ton of steel oxygen-lanced; plus
- (ii) tons of steel oxygen-lanced inside the enclosure hoods per year, while the baghouse is in operation, times 2.8 lbs PM/ ton of steel oxygen-lanced, times 0.05; and
- f. Compliance with the allowable annual stack emissions shall be demonstrated by multiplying the lbs PM/ hr emission rate, determined by Method 5 of 40 CFR Part 60, by the total annual hours of operation.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
    - a. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.
    - b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate of 0.030 grain of PM/dscf of exhaust gases and lbs/hr of PM.
    - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5 of 40 CFR Part 60, Appendix A.
    - d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
  3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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.

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).
- F. **Miscellaneous Requirements**
1. The following terms and conditions in this permit to operate are federally enforceable requirements: A-E.