

Facility ID: 1576130697 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.

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Facility ID: 1576130697 Emissions Unit ID: B001 Issuance type: Draft State Permit To Operate

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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>
Boiler #4501 45 MMBtu/hr, Natural Gas Fired (with stack)	OAC rule 3745-17-07, including but not limited to 3745-17-07(A)	Visible Emission Limit (See Additional Terms & Conditions 2.a.)
(same)	OAC rule 3745-17-10, including but not limited to OAC rule 3745-17-10 (B)(1)	Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.
(same)	OAC rule 3745-18-06, including but not limited to OAC rule 3745-18-06(A)	Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input if fuel heat content is less than 950 Btu per standard cubic foot and sulfur content is greater than 0.6 pound per MMSCF.

2. **Additional Terms and Conditions**
 - (a) Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's 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, as a six-minute average, at any time.
The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: P005, P006, P009, P019, P020, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002 and all unpermitted natural gas burning equipment.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a

rolling 12-month summation of the monthly natural gas usage.

3. In order to ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

1 135 MMCF
1-2 265 MMCF
1-3 393 MMCF
1-4 493 MMCF
1-5 583 MMCF
1-6 670 MMCF
1-7 755 MMCF
1-8 833 MMCF
1-9 915 MMCF
1-10 1000 MMCF
1-11 1110 MMCF
1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:
Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:
The AP-42 emission factor for filterable particulate emissions, 6.2 lbs/MMCF, shall be used to show compliance with the allowable particulate emission rate.

Emission Limitation:
The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:
The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.b above, expressed in MMCF.

Emission Limitation:
Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(1), EPA Method nine (9).

Emission Limitation:
Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input.

Applicable Compliance Method:

The AP-42 emission factor, 0.6 lb/MMCF, for natural gas combustion shall be used to show compliance with the allowable sulfur dioxide emission rate.

F. **Miscellaneous Requirements**

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (B001) and emissions units P005, P006, P009, P019, P020, P021, P022, P025, P026, P027, P028, P029, P030 and B002: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: B002 Issuance type: Draft State Permit To Operate

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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>
Boiler #4506 45 MMBtu/hr, Natural Gas Fired (with stack)	OAC rule 3745-17-07, including but not limited to 3745-17-07(A)	Visible Emission Limit (See Additional Terms & Conditions 2.a.)
(same)	OAC rule 3745-17-10, including but not limited to OAC rule 3745-17-10 (B)(1)	Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.
(same)	OAC Rule 3745-18-06, including but not limited to OAC Rule 3745- 18-06 (A)	Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input if fuel heat content is less than 950 Btu per standard cubic foot and sulfur content is greater than 0.6 pound per MMSCF.

2. **Additional Terms and Conditions**

- (a) Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's 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, as a six-minute average, at any time.
The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: P005, P006, P009, P019, P020, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002 and all unpermitted natural gas burning equipment.

B. **Operational Restrictions**

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

1 135 MMCF

- 1-2 265 MMCF
- 1-3 393 MMCF
- 1-4 493 MMCF
- 1-5 593 MMCF
- 1-6 670 MMCF
- 1-7 755 MMCF
- 1-8 833 MMCF
- 1-9 915 MMCF
- 1-10 1000 MMCF
- 1-11 1110 MMCF
- 1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:
Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:
The AP-42 emission factor for filterable particulate emissions, 6.2 lbs/MMCF, shall be used to show compliance with the allowable particulate emission rate.

Emission Limitation:
The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:
The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.b above, expressed in MMCF.

Emission Limitation:
Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:
OAC Rule 3745-17-03 (B)(1), EPA Method nine (9)

Emission Limitation:
Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input.

Applicable Compliance Method:
The AP-42 emission factor, 0.6 lb/MMCF, for natural gas combustion shall be used to show compliance with the allowable sulfur dioxide emission rate.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this

emissions unit (B002) and emissions units P005, P006, P009, P019, P020, P021, P022, P025, P026, P027, P028, P029, P030 and B001: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P005 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #10186 2.2 MMBtu/hr, Natural Gas Fired (with stack) for steel coil	OAC Rule 3745-35-07	(See Additional Terms & Conditions.)
(Same)	OAC Rule 3745-17-07 (A)	Visible Emission Limit (See Additional Terms and Conditions 2.b.)
(Same)	OAC Rule 3745-17-11	No process weight can be ascertained; therefore, no applicable emission limit.

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P005) in combination with emissions units P006, P009, P019, P020, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002, and all unpermitted natural gas burning equipment. Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's 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, as a six-minute average, at any time.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural Gas Consumption (MMCF)

- 1 135 MMCF
- 1-2 265 MMCF
- 1-3 393 MMCF
- 1-4 493 MMCF
- 1-5 593 MMCF
- 1-6 670 MMCF
- 1-7 755 MMCF
- 1-8 833 MMCF
- 1-9 915 MMCF
- 1-10 1000 MMCF
- 1-11 1110 MMCF
- 1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas

usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:

Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:

OAC Rule 3745-17-03 (B)(1), EPA Method nine (9)

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P005) and emissions units P006, P009, P019, P020, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P006 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #5579 7.75 MMBtu/hr, Natural Gas Fired (without stack) for steel coil	OAC Rule 3745-35-07	No particulate limits since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P006) in combination with emissions units P005, P009, P019, P020, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002, and all unpermitted natural gas burning equipment.

B. Operational Restrictions

- 1. Only natural gas (no oil) shall be fired in this facility's emissions units.
- 2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
- 3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

- 1 135 MMCF
- 1-2 265 MMCF
- 1-3 393 MMCF
- 1-4 493 MMCF
- 1-5 593 MMCF
- 1-6 670 MMCF
- 1-7 755 MMCF
- 1-8 833 MMCF
- 1-9 915 MMCF
- 1-10 1000 MMCF
- 1-11 1110 MMCF
- 1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
- 2. The permittee shall submit annual reports by February 15 of each year, showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P006) and emissions units P005, P009, P019, P020, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P009 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #8457 16 MMBtu/hr, Natural Gas Fired (with stack) for steel coil	OAC Rule 3745-35-07	(See Additional Terms & Conditions.)
(Same)	OAC Rule 3745-17-07 (A)	Visible Emission Limit (See Additional Terms and Conditions 2.b.)
(Same)	OAC Rule 3745-17-11	No process weight can be ascertained; therefore, no applicable emission limit.

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P009) in combination with emissions units P005, P006, P019, P020, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002, and all unpermitted natural gas burning equipment. Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's 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, as a six-minute average, at any time.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

- 1 135 MMCF
- 1-2 265 MMCF
- 1-3 393 MMCF

- 1-4 493 MMCF
- 1-5 593 MMCF
- 1-6 670 MMCF
- 1-7 755 MMCF
- 1-8 833 MMCF
- 1-9 915 MMCF
- 1-10 1000 MMCF
- 1-11 1110 MMCF
- 1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:
The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:
The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:
Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:
OAC Rule 3745-17-03 (B)(1), EPA Method nine (9)

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P009) and emissions units P005, P006, P019, P020, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P019 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #8000 15.34 MMBtu/hr, Natural Gas Fired (with stack) for steel coil	OAC Rule 3745-35-07	(See Additional Terms & Conditions.)
(Same)	OAC Rule 3745-17-07 (A)	Visible Emission Limit (See Additional Terms and Conditions 2.b)
(Same)	OAC Rule 3745-17-11	No process weight can be ascertained; therefore, no applicable emission limit.

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P019) in combination with emissions units P005, P006, P009, P020, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002, and all unpermitted natural gas burning equipment. Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's 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, as a six-minute average, at any time.

B. Operational Restrictions

- 1. Only natural gas (no oil) shall be fired in this facility's emissions units.
- 2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
- 3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) (After Permit Issuance)	Allowable Total Cumulative Natural Gas Consumption (MMCF)
1	135 MMCF
1-2	265 MMCF
1-3	393 MMCF
1-4	493 MMCF
1-5	593 MMCF
1-6	670 MMCF
1-7	755 MMCF
1-8	833 MMCF
1-9	915 MMCF
1-10	1000 MMCF
1-11	1110 MMCF
1-12	1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information:
 - The total natural gas usage for all emissions units at the facility.
 - Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
 - For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the

maximum allowable cumulative natural gas.

After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.

2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:

Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:

OAC Rule 3745-17-03 (B)(1), EPA Method nine (9)

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P019) and emissions units P005, P006, P009, P020, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002: Special Terms and Conditions: A, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P020 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #8833 7.75 MMBtu/hr, Natural Gas Fired (without stack) for steel coil	OAC Rule 3745-35-07	No particulate limits since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P020) in combination with emissions units P005, P006, P009, P019, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002, and all unpermitted natural gas burning equipment.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

1 135 MMCF
1-2 265 MMCF
1-3 393 MMCF
1-4 493 MMCF
1-5 593 MMCF
1-6 670 MMCF
1-7 755 MMCF
1-8 833 MMCF
1-9 915 MMCF
1-10 1000 MMCF
1-11 1110 MMCF
1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P020) and emissions units P005, P006, P009, P019, P021, P022, P025, P026, P027, P028, P029, P030, B001 and B002: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P021 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #8943 7.74 MMBtu/hr, Natural Gas Fired (without stack) for steel coil	OAC Rule 3745-35-07	No particulate limits since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P021) in combination with emissions units P005, P006, P009, P019, P020, P022, P025, P026, P027, P028, P029, P030, B001 and B002, and all unpermitted natural gas burning equipment.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

- 1 135 MMCF
- 1-2 265 MMCF
- 1-3 393 MMCF
- 1-4 493 MMCF
- 1-5 593 MMCF
- 1-6 670 MMCF
- 1-7 755 MMCF
- 1-8 833 MMCF
- 1-9 915 MMCF
- 1-10 1000 MMCF
- 1-11 1110 MMCF
- 1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
 For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
 After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P021) and emissions units P005, P006, P009, P019, P020, P022, P025, P026, P027, P028, P029, P030, B001 and B002: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P022 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #5638 7.75 MMBtu/hr, Natural Gas Fired (without stack) for steel coil	OAC Rule 3745-35-07	No particulate limits since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P022) in combination with emissions units P005, P006, P009, P019, P020, P021, P025, P026, P027, P028, P029, P030, B001 and B002, and all unpermitted natural gas burning equipment.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

1 135 MMCF
1-2 265 MMCF
1-3 393 MMCF
1-4 493 MMCF
1-5 593 MMCF
1-6 670 MMCF
1-7 755 MMCF
1-8 833 MMCF
1-9 915 MMCF
1-10 1000 MMCF
1-11 1110 MMCF
1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:
The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:
The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P022) and emissions units P005, P006, P009, P019, P020, P021, P025, P026, P027, P028, P029, P030, B001 and B002: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P025 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #11391 7.75 MMBtu/hr, Natural Gas Fired (without stack) for steel coil	OAC Rule 3745-35-07	No particulate limits since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P025) in combination with emissions units P005,P006, P009, P019, P020, P021, P022, P026, P027, P028, P029, P030, B001 and B002, and all unpermitted natural gas burning equipment.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

- 1 135 MMCF
- 1-2 265 MMCF
- 1-3 393 MMCF
- 1-4 493 MMCF
- 1-5 593 MMCF
- 1-6 670 MMCF
- 1-7 755 MMCF
- 1-8 833 MMCF
- 1-9 915 MMCF
- 1-10 1000 MMCF
- 1-11 1110 MMCF
- 1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year, showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P025) and emissions units P005, P006, P009, P019, P020, P021, P022, P026, P027, P028, P029, P030, B001 and B002: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P026 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #8955 7.75 MMBtu/hr, Natural Gas Fired (without stack) for steel coil	OAC Rule 3745-35-07	No particulate limits since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P026) in combination with emissions units P005, P006, P009, P019, P020, P021, P022, P025, P027, P028, P029, P030, B001 and B002, and all unpermitted natural gas burning equipment.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

1 135 MMCF
1-2 265 MMCF
1-3 393 MMCF
1-4 493 MMCF
1-5 593 MMCF
1-6 670 MMCF
1-7 755 MMCF
1-8 833 MMCF
1-9 915 MMCF
1-10 1000 MMCF
1-11 1110 MMCF
1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year, showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:
The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:
The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P026) and emissions units P005, P006, P009, P019, P020, P021, P022, P025, P027, P028, P029, P030, B001 and B002: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P027 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #8377 5.45 MMBtu/hr, Natural Gas Fired (without stack) for steel coil	OAC Rule 3745-35-07	No particulate limits since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P027) in combination with emissions units P005, P006, P009, P019, P020, P021, P022, P025, P026, P028, P029, P030, B001 and B002, and all unpermitted natural gas burning equipment.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

- 1 135 MMCF
- 1-2 265 MMCF
- 1-3 393 MMCF
- 1-4 493 MMCF
- 1-5 593 MMCF
- 1-6 670 MMCF
- 1-7 755 MMCF
- 1-8 833 MMCF
- 1-9 915 MMCF
- 1-10 1000 MMCF
- 1-11 1110 MMCF
- 1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
 For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
 After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P027) and emissions units P005, P006, P009, P019, P020, P021, P022, P025, P026, P028, P029, P030, B001 and B002: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P028 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #8331 5.45 MMBtu/hr, Natural Gas Fired (without stack) for steel coil	OAC Rule 3745-35-07	No particulate limits since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P028) in combination with emissions units P005, P006, P009, P019, P020, P021, P022, P025, P026, P027, P029, P030, B001 and B002, and all unpermitted natural gas burning equipment.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

1 135 MMCF
1-2 265 MMCF
1-3 393 MMCF
1-4 493 MMCF
1-5 593 MMCF
1-6 670 MMCF
1-7 755 MMCF
1-8 833 MMCF
1-9 915 MMCF
1-10 1000 MMCF
1-11 1110 MMCF
1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P028) and emissions units P005, P006, P009, P019, P020, P021, P022, P025, P026, P027, P029, P030, B001 and B002: Special Terms and Conditions: A, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P029 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #5656 5.45 MMBtu/hr, Natural Gas Fired (without stack) for steel coil	OAC Rule 3745-35-07	No particulate limits since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NOx emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P029) in combination with emissions units P005, P006, P009, P019, P020, P021, P022, P025, P026, P027, P028, P030, B001 and B002, and all unpermitted natural gas burning equipment.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

- 1 135 MMCF
- 1-2 265 MMCF
- 1-3 393 MMCF
- 1-4 493 MMCF
- 1-5 593 MMCF
- 1-6 670 MMCF
- 1-7 755 MMCF
- 1-8 833 MMCF
- 1-9 915 MMCF
- 1-10 1000 MMCF
- 1-11 1110 MMCF
- 1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
 For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
 After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The total NOx emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P029) and emissions units P005, P006, P009, P019, P020, P021, P022, P025, P026, P027, P028, P030, B001 and B002: Special Terms and Conditions: A.2, B, C, D, & E.

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Facility ID: 1576130697 Emissions Unit ID: P030 Issuance type: Draft State Permit To Operate

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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>
Annealing Furnace #8879 5.45 MMBtu/hr, Natural Gas Fired (without stack) for steel coil	OAC Rule 3745-35-07	No particulate limits since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from the Republic Engineered Steel, Inc. CFB facility shall not exceed 88 tons/year. This annual emission limit shall be achieved by restricting the total amount of natural gas burned at this facility. Combustion of natural gas is the major source of NOx emissions at this site.

The NO_x emission limitation and fuel combustion restrictions apply to the following emissions units at this facility: (P030) in combination with emissions units P005, P006, P009, P019, P020, P021, P022, P025, P026, P027, P028, P029, B001 and B002, and all unpermitted natural gas burning equipment.

B. Operational Restrictions

1. Only natural gas (no oil) shall be fired in this facility's emissions units.
2. The maximum annual amount of natural gas burned at this facility shall not exceed 1,225 MMCF, based upon a rolling 12-month summation of the monthly natural gas usage.
3. In order to ensure federal enforceability during the first 12 calendar months of operation following the permit issuance, the permittee shall not exceed the following natural gas usage limits in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

1 135 MMCF
1-2 265 MMCF
1-3 393 MMCF
1-4 493 MMCF
1-5 593 MMCF
1-6 670 MMCF
1-7 755 MMCF
1-8 833 MMCF
1-9 915 MMCF
1-10 1000 MMCF
1-11 1110 MMCF
1-12 1225 MMCF

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned in all emissions units at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,225 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NO_x emission and the total amount of natural gas used during the previous calendar year.

(See reporting requirements in Part I, General Terms and Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

The total NO_x emissions from this facility shall not exceed 88 tons/yr.

Applicable Compliance Method:

The NO_x emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NO_x emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NO_x for this emissions unit (P030) and emissions units P005, P006, P009, P019, P020, P021, P022, P025, P026, P027, P028, P029, B001 and B002: Special Terms and Conditions: A.2, B, C, D, & E.