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Facility Name: **Wheeling-Pittsburg Steel Corp.**

Application Number: **17-1623**

Date: **Draft (Date to be entered upon final issuance)**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

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

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an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

PERMIT TO OPERATE APPLICATION

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

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SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Wheeling-Pittsburg Steel Corp.** located in **Jefferson** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>F015</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>
F001 (Mod)	cont'd	Unpaved and paved plant roadways and parking areas - Mingo Junction (modification to allow traffic increase on surfaces traveled by trucks hauling high flux iron pellets)	from barges, (see Additional Special Term and Condition C.1.), pellet conveyors (see Additional Special Term and Condition C.2.), pellet handling (see Additional Special Term and Condition C.3.), and pellet transfer points (see Additional Special Term and Condition C.4.)
		Back-up system for pellet unloading	Compliance with the Work Practice Plan in Appendix A of OAC Rule 3745-17-13.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>	
Partial enclosures, where practical, minimized drop heights, and water or chemical dust suppressants, as needed	Applicable Federal & OAC Rules		Permit Allowable Mass Emissions and/or Control/Usage Requirements	best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Additional Special Term and Condition C.5. through C.7.)	
	3745-31-05		4.91 pounds/hour and 21.5 TPY PM ₁₀ ; All surfaces shall comply with the Work Practice Plan in Appendix A of OAC Rule 3745-17-13, including surfaces traveled by trucks hauling high flux iron pellets (see Additional Special Term and Conditions No. 1 and 2)	*	
		3745-17-07 (B) (1) *			*
		3745-17-08 (B)			*
	3745-17-13 (F)			*	
	3745-31-05		2.50 pounds/hour and 0.625 TPY PM ₁₀ ; 20 percent opacity, as a 3-minute average;		

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* Less stringent than, or equivalent to, OAC 3745-31-05.

SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>	<u>Tons/Year (increase)*</u>
PM ₁₀	22.125	1.065

* Net increase for the pellet unloading system project (primary Permit-to-Install No. 17-1630 and back-up) is 10.79 tons/year PM₁₀.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

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

MAINTENANCE OF EQUIPMENT

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

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MALFUNCTION/ABATEMENT

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

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

AIR POLLUTION NUISANCES PROHIBITED

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

CONSTRUCTION COMPLIANCE CERTIFICATION

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

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Roadways and Parking Areas Emission Limit

1. Total combined emissions of PM₁₀ from unpaved roads, parking lots, laydown, entrance, unloading areas and berms, and irregular paved surfaces, and from paved roads, which are located at this facility, as identified in the Work Practice Plan in Appendix A of OAC 3745-17-13, shall not exceed 4.91 pounds per hour.

B. Roadways and Parking Areas Control Requirements

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1. The permittee shall comply with the Work Practice Plan in Appendix A of OAC rule 3745-17-13. Control of unpaved surfaces traveled by trucks hauling high flux iron pellets shall be maintained at the 95 percent control level, as determined by the methodology set forth in the U.S. Environmental Protection Agency reference document Control of Open Fugitive Dust Sources (EPA-450/3-88-008), Sections 2.0 and 3.0, while the back-up high flux iron pellet barge unloading station (F015) is being used.

C. Material Handling Requirements

1. The pellet unloading stations for barges, railcars, or trucks that are covered by this permit and subject to the requirements of OAC rules 3745-31-05, 3745-17-07 and 3745-17-08 are listed below:

Clam from barge to bin
Truck dump

2. The pellet conveyors that are covered by this permit and subject to the requirements of OAC rules 3745-31-05, 3745-17-07 and 3745-17-08 are listed below:

All belt conveyors

3. The pellet handling operations that are covered by this permit and subject to the requirements of OAC rules 3745-31-05, 3745-17-07 and 3745-17-08 are listed below:

Bin to truck
Front loader to belt conveyor bin

4. The pellet transfer points that are covered by this permit and subject to the requirements of OAC rules 3745-31-05, 3745-17-07 and 3745-17-08 are listed below:

All transfer points

5. The permittee shall employ best available control measures on all pellet unloading stations for barges, railcars and/or trucks, pellet conveyors, pellet handling operations, and pellet transfer points for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the pellet unloading stations,

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pellet conveyors, pellet handling operations, and pellet transfer points with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies or use adequate enclosure to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

6. For each pellet unloading station, pellet conveyor, pellet handling operation, and pellet transfer point that is not adequately enclosed, such unloading station, conveyor, handling operation or transfer point shall be treated with water and/or suitable dust suppression chemicals if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during operation of any pellet unloading station, pellet conveyor, pellet handling, or pellet transfer point until further observation confirms that use of the control measures is unnecessary.
7. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-31-05 and 3745-17-08.

D. Operational Restrictions

1. This installation is Phase 1 of a project that will allow the unloading and use of pellets brought in by barges. Emission unit number F015 shall operate no more than 500 hours per rolling 12-month period.
2. The maximum annual operating hours for this emissions unit shall not exceed 500 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	125
1-2	159
1-3	193
1-4	227
1-5	261
1-6	295
1-7	329
1-8	363
1-9	397
1-10	431
1-11	465
1-12	500

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

E. Monitoring And/or Recordkeeping Requirements

1. Except as otherwise provided in this section and for pellet unloading stations that are not adequately enclosed, the permittee shall perform inspections of such pellet unloading stations in accordance with the following frequencies:

<u>pellet unloading station identification</u>	<u>minimum inspection frequency</u>
All	Once per day (during operating hours)

2. Except as otherwise provided in this section and for pellet conveyors that are not adequately enclosed, the permittee shall perform inspections of such pellet conveyors in accordance with the following frequencies:

<u>pellet conveyor identification</u>	<u>minimum inspection frequency</u>
All	Once per day (during operating hours)

3. Except as otherwise provided in this section and for pellet handling operations that are not adequately enclosed, the permittee shall perform inspections of such pellet handling operations in accordance with the following frequencies:

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<u>pellet handling operation identification</u>	<u>minimum inspection frequency</u>
All	Once per day (during operating hours)

4. Except as otherwise provided in this section and for pellet transfer points that are not adequately enclosed, the permittee shall perform inspections of such pellet transfer points in accordance with the following frequencies:

<u>pellet transfer point identification</u>	<u>minimum inspection frequency</u>
All	Once per day (during operating hours)

5. The above-mentioned inspections shall be performed during representative, normal operating conditions. Inspections shall be performed on days that the emissions unit is in operation.
6. The permittee may, upon receipt of written approval from the Ohio EPA, Southeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C) (1) and (C) (3) of OAC rule 3745-77-08.
7. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and,
 - d. on a calendar quarter basis, the total number of

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days the control measures were implemented.

The information in 7.d. shall be kept separately for (a) the pellet unloading stations, (b) the pellet conveyors, (c) the pellet handling operations, and (d) the pellet transfer points, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

8. The permittee shall maintain records of the hours of operation of F015, on a monthly basis, and calculate the cumulative total hours operated during the first year and on a rolling, 12-month basis thereafter. These records shall indicate the specific dates that the emissions unit was in operation.

F. **Reporting Requirements**

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences (see No. 4 below):
 - a. each day during which an inspection was not performed by the required frequency;
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented; and,
 - c. each instance where records show an exceedance of the rolling, 12-month operating limit of 500 hours.
2. If there are no deviations during a calendar quarter that must be reported pursuant to the reporting requirements of this permit, the permittee shall submit a quarterly report which states that no deviations occurred during that quarter (see No.4 below).
3. The permittee shall submit quarterly reports of the hours operated per month for F015, and the cumulative total hours operated on a rolling, 12-month basis (see No. 4 below).
4. All quarterly reports shall be submitted by January 31,

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April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. These reports can be submitted together.

5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels.

G. Testing Requirements

1. Compliance with the emission limitations for pellet unloading, conveyors, handling operations, and transfer points (F015) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
2. Compliance with the emission limitations for F001 shall be determined in accordance with the Work Practice Plan in Appendix A of OAC rule 3745-17-13.
3. Compliance with the hours limitation for F015 shall be demonstrated by monthly records of hours operated, and the cumulative total hours operated on a rolling, 12-month basis.