

Synthetic Minor Determination and/or Netting Determination
Permit To Install No. 02-14110

A. Source Description

Lorain Tubular Co. proposes to modify the No. 2 Reheat Furnace (P037) in No. 3 Seamless Mill to replace and install new burners which will increase the burner capacity from its original design of 58.8 MMBtu/hr to 77.8 MMBtu/hr. In addition, the No. 2 Reheat Furnace will limit its natural gas fuel usage to 287 MMCF per year.

B. Facility Emissions and Attainment Status

This facility is a Major Stationary Source located in Lorain County. The area is designated attainment for carbon monoxide, nitrogen oxides, sulfur dioxide, ozone and lead. Lorain County is designated as a Group II Attainment Area for PM10 particulate.

C. Source Emissions

Potential emissions of NOx from the new source will exceed the emission threshold limit of 40 tons per year and would trigger PSD. The actual emissions from this emissions unit for years 1998 and 1999 were 5.11 and 4.31 TPY, with a two year average emission of 4.71 TPY. The PTI will contain terms and conditions which limit the natural gas fuel usage to 287 MMCF per year. Allowable emissions of NOx are 21.53 tons per year.

Contemporaneous Emission Increases and Decreases

Installation of the new burners on the No. 2 Reheat Furnace (P037) and a contemporaneous emission increase from the Walking Beam Reheat Furnace (P001) under PTI # 02-13781, issued April 26, 2000, at the facility will result in net emission increases and decreases as follows:

| | <u>NOx</u> (Tons Per Year) |
|--|----------------------------|
| Modified No. 2 Reheat furnace (P037) | 21.53 |
| Contemporaneous emission decrease (P037) | (4.71) |
| Contemporaneous emission increase (P001) | 22.21 |
| ----- | |
| Net Emission Change | 39.03 |
| ----- | |
| Significance Level | 40 |

D. Conclusion

Installation of the new burners on the No. 2 Reheat Furnace which increases the burner capacity from 58.8 MMBtu/hr to 77.8 MMBtu/hr and limiting the natural gas fuel usage to 287 MMCF/yr will result in allowable emissions of 21.53 tons of NOx per year. The net increase in emissions of NOx are less than the PSD threshold limit for this pollutant. Therefore, the requirements of PSD do not apply to the installation of the new burners on the No. 2 Reheat Furnace in No. 3 Seamless Mill.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
LORAIN COUNTY
Application No: 02-14110**

CERTIFIED MAIL

Mailing Address:

44-3020 FAX: (614) 644-2329

Lazarus Gov.
Center
P.O. Box
1049

DATE: 7/27/00

Lorain Tubular Company LLC
George Inglis
2199 E 28th St
Lorain, OH 44055

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NEDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

DRAFT PERMIT TO INSTALL 02-14110

Application Number: 02-14110
APS Premise Number: 0247080961
Permit Fee: **To be entered upon final issuance**
Name of Facility: Lorain Tubular Company LLC
Person to Contact: George Inglis
Address: 2199 E 28th St
Lorain, OH 44055

Location of proposed air contaminant source(s) [emissions unit(s)]:

2199 E 28th St
Lorain, Ohio

Description of proposed emissions unit(s):

#2 Reheat Furnace.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Lorain Tubular Company LLC

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PTI Application: 02-14110

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

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5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions

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designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

5. Termination of Permit To Install

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This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

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within a reasonable time a continuing program of installation or modification. 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.

6. Construction of New Sources(s)

The proposed emissions unit(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 emissions unit(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 OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

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9. 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.

10. 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.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

| SUMMARY (for informational purposes only) | |
|--|-----------------------------|
| TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS | |
| <u>Pollutant</u> | <u>Tons Per Year</u> |
| NOx | 21.53 |
| CO | 12.0 |
| OC | 1.58 |
| PE | 1.10 |
| SO2 | 0.09 |

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

**Lorain
PTI A**

Emissions Unit ID: P037

Issued: To be entered upon final issuance

Part III - SPECIAL

TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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> |
|---|--------------------------------------|---|
| P037 - 77.8 MMBtu/hr Natural Gas Fired No. 2 Reheat Furnace | OAC rule 3745-31-05 (D) | NOx: 21.53 tons per rolling 12-month period |
| | OAC rule 3745-31-05 (A)(3) | NOx: 0.15 lb/MMBtu, 11.67 lbs/hr , 21.53 tpy CO: 6.54 lbs/hr, 12.0 tpy OC: 0.86 lb/hr, 1.58 tpy PE: 0.60 lb/hr, 1.10 tpy SO2: 0.05 lb/hr, 0.09 tpy visible particulate emissions shall not exceed 5% opacity as a 6-minute average. |
| | OAC rule 3745-17-11 | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| | OAC rule 3745-17-07 (A)(1) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |

2. Additional Terms and Conditions

2.a None

Lorain

PTI A

Emissions Unit ID: P037

Issued: To be entered upon final issuance**II. Operational Restrictions**

1. The permittee shall use only natural gas as fuel for this emissions unit.
2. The maximum annual natural gas fuel usage for this emissions unit shall not exceed 287 MMCF, based upon a rolling, 12-month summation of natural gas fuel usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the natural gas fuel usage specified in the following table:

| <u>Month</u> | <u>Maximum Allowable Cumulative Fuel Usage</u> |
|--------------|--|
| 1 | 23.92 MMCF |
| 1-2 | 47.83 MMCF |
| 1-3 | 71.75 MMCF |
| 1-4 | 95.67 MMCF |
| 1-5 | 119.58 MMCF |
| 1-6 | 143.50 MMCF |
| 1-7 | 167.42 MMCF |
| 1-8 | 191.33 MMCF |
| 1-9 | 215.25 MMCF |
| 1-10 | 239.17 MMCF |
| 1-11 | 263.08 MMCF |
| 1-12 | 287.00 MMCF |

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

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the following information:
 - a. The natural gas fuel usage for each month.

- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the natural gas fuel usage.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative natural gas fuel usage for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month natural gas fuel usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas fuel usage. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

V. Testing Requirements

1. Emission Limitation:

0.15 lb of NO_x per MMBtu

Applicable Compliance Method:

Within 90 days after completion of installation, the permittee shall conduct, or have conducted, an emission test for this emissions unit in order to demonstrate compliance with the allowable mass emission rate for oxides of nitrogen. The compliance test shall be conducted in accordance with the test methods and procedures specified in Method 7 or 7E of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office(s) refusal to accept of the emissions test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Emission Limitation:

11.67 lbs of NO_x per hour

Applicable Compliance Method:

Compliance shall be determined by multiplying the results of the most recent compliance test (lb/MMBtu) by the maximum heat input of 77.8 MMBtu/hr.

3. Emission Limitation:

21.53 tons of NO_x per rolling 12-month period

Applicable Compliance Method:

Compliance shall be determined by multiplying the results of the most recent compliance test (lb/MMBtu) by the monthly natural gas fuel usage rate (MMCF). The product shall then be multiplied by 1000 BTU/CF and divided by 2,000 lbs/ton. Sum the monthly emission rates over any consecutive 12-month period to show compliance with the above limit.

4. Emission Limitation:

6.54 lbs/hr of CO

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum heat input of 77.8 MMBtu/hr by the emission factor of 84 lb of CO/MM scf (from AP-42, Table 1.4-1, 7/98 version) and dividing by 1000 Btu.

5. Emission Limitation:

12.0 tons of CO per year

Applicable Compliance Method:

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Emissions Unit ID: P037

Compliance shall be determined by multiplying the emission factor of 84 lbs/MM scf (from AP-42, Table 1.4-1, 7/98 version) by the maximum annual natural gas fuel usage of 287 MMcf and dividing by 2,000 lbs/ton.

6. Emission Limitation:

0.86 lb/hr of OC

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum heat input of 77.8 MMBtu/hr by the emission factor of 11 lb of OC/MM scf (from AP-42, Table 1.4-2, 7/98 version) and dividing by 1000 Btu.

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7. Emission Limitation:

1.58 tons of OC per year

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 11 lbs/MM scf (from AP-42, Table 1.4-2, 7/98 version) by the maximum annual natural gas fuel usage of 287 MMcf and dividing by 2,000 lbs/ton.
8. Emission Limitation:

0.60 lb/hr of PE

Applicable Compliance Method:

If required the by Ohio EPA, compliance shall be determined through emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03 (B)(1).
9. Emission Limitation:

1.10 tons of particulate matter per year

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 7.6 lb/MM scf (from AP-42, Table 1.4-1, 7/98 version) by the maximum annual natural gas fuel usage of 287 MMcf and dividing by 2,000 lbs/ton.
10. Emission Limitation:

0.05 lb/hr of SO₂

Applicable Compliance Method:

Compliance shall be determined by multiplying the actual heat input of 77.8 MMBtu/hr by the emission factor of 0.6 lb of SO₂/MM scf (from AP-42, Table 1.4-2, 7/98 version) and dividing by 1000 Btu.

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Lorain

PTI A

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Emissions Unit ID: P037

11. Emission Limitation:

0.10 ton of SO₂ per year

**Lorain
PTI A**

Emissions Unit ID: P037

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 0.6 lb/MM scf (from AP-42, Table 1.4-1, 7/98 version) by the maximum annual natural gas fuel usage of 287 MMcf and dividing by 2,000 lbs/ton

12. Emission Limitation:

5% opacity of visible particulate emissions

Applicable Compliance Method:

Compliance with the visible emission limitation for the reheat furnace 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)(1) of OAC rule 3745-17-03.

VI. Miscellaneous Requirements

1. The requirements of this permit, PTI 02-14110, shall replace entirely the requirements for No. 2 Reheat Furnace contain in Paragraph 9 of the "Supplemental Information/Additional Special Terms and Conditions (Required by the Consent Decree) in PTI 02-7768, issued May 12, 1994.
2. Installation of the new burners on the existing No. 2 Reheat Furnace (P037) will result in a potential to emit amount of 51.11 ton per year of NO_x emissions. To establish a baseline emissions amount for the modification of the existing No. 2 Reheat Furnace (P037), the last two years of actual emissions from this emissions unit for years 1998 and 1999 which resulted in a two year average emission of (5.11 and 4.31 TPY) 4.71 TPY. The net emissions increase due to the modification was (51.11 - 4.71 TPY) 46.40 TPY of NO_x emissions which is over the significant level of 40 TPY for NO_x (a major modification at a major facility).

The applicant has chosen to accept an operational restriction for P037 which limits NO_x emissions to 21.53 TPY along with a contemporaneous emission increase from the Walking Beam Reheat Furnace (P001) under PTI # 02-13781, issued April 26, 2000, at the facility will result in net emission increases and decreases as follows:

| | <u>NO_x</u> (Tons Per Year) |
|--------------------------------------|---------------------------------------|
| Modified No. 2 Reheat furnace (P037) | 21.53 |

Lorain Tubular Company LLC**PTI Application: 02-14110****Issued****Facility ID: 0247080961**

Emissions Unit ID: P037

| | |
|--|--------|
| Contemporaneous emission decrease (P037) | (4.71) |
|--|--------|

| | |
|--|-------|
| Contemporaneous emission increase (P001) | 22.21 |
|--|-------|

| | |
|---------------------|-------|
| ----- | |
| Net Emission Change | 39.03 |
| ----- | |

Hence, the net change will be 39.03 TPY of NO_x which is below the 40 TPY significant level for purposes of PSD review and therefore would not trigger PSD review due to the modification of P037 and the increase of P001 as denoted in PTI # 02-13781, issued April 26, 2000.

**Lorain
PTI A**

Emissions Unit ID: P037

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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> |
|---|--------------------------------------|--|
| P037 - 77.8 MMBtu/hr Natural Gas Fired No. 2 Reheat Furnace | | |

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 02-14110 Facility ID: 0247080961

FACILITY NAME Lorain Tubular Company LLC

FACILITY DESCRIPTION #2 Reheat Furnace CITY/TWP Lorain

SIC CODE 3317 SCC CODE 1-02-006-02 EMISSIONS UNIT ID P037

EMISSIONS UNIT DESCRIPTION 77.8 MMBtu/hr Natural Gas Fired No. 2 Reheat Furnace

DATE INSTALLED March 2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

| Pollutants | Air Quality Description | Actual Emissions Rate | | PTI Allowable | |
|--------------------|-------------------------|-----------------------|---------------|-----------------|---------------|
| | | Short Term Rate | Tons Per Year | Short Term Rate | Tons Per Year |
| Particulate Matter | | | | | |
| PM ₁₀ | attainment | 0.60 lb/hr | 1.10 | 0.60 lb/hr | 1.10 |
| Sulfur Dioxide | attainment | 0.05 lb/hr | 0.09 | 0.05 lb/hr | 0.09 |
| Organic Compounds | attainment | 0.86 lb/hr | 1.58 | 0.86 lb/hr | 1.58 |
| Nitrogen Oxides | attainment | 11.67 lbs/hr | 21.53 | 11.67 lbs/hr | 21.53 |
| Carbon Monoxide | attainment | 6.54 lbs/hr | 12.0 | 6.54 lbs/hr | 12.0 |
| Lead | | | | | |
| Other: Air Toxics | | | | | |

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination BAT: 0.15 lb of Nox per MMBtu, natural gas fuel usage restriction to 287 MMCF/yr, burns only natural gas as fuel, visible particulate emissions of less than 5% opacity as a 6-minute average.

Basis: similar sources, OAC regulations

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 02-14110 Facility ID: 0247080961

FACILITY NAME Lorain Tubular Company LLC

FACILITY DESCRIPTION #2 Reheat Furnace CITY/TWP Lorain

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

| | <u>Electronic</u> | <u>Additional information File Name Convention (your PTI # plus this letter)</u> | <u>Hard Copy</u> | <u>None</u> |
|---|-------------------------------------|--|-------------------------------------|--------------------------|
| <u>Calculations (required)</u> | <input checked="" type="checkbox"/> | 0000000c.wpd | <input type="checkbox"/> | |
| <u>Modeling form/results</u> | <input type="checkbox"/> | 0000000s.wpd | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>PTI Application (complete or partial)*</u> | <input type="checkbox"/> | 0000000a.wpd | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <u>BAT Study</u> | <input type="checkbox"/> | 0000000b.wpd | <input type="checkbox"/> | <input type="checkbox"/> |
| <u>Other/misc.</u> | <input type="checkbox"/> | 0000000t.wpd | <input type="checkbox"/> | <input type="checkbox"/> |

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install No. **02-14110**

A. Source Description

Lorain Tubular Co. proposes to modify the No. 2 Reheat Furnace (P037) in No. 3 Seamless Mill to replace and install new burners which will increase the burner capacity from its original design of 58.8 MMBtu/hr to 77.8 MMBtu/hr. In addition, the No. 2 Reheat Furnace will limit its natural gas fuel usage to 287 MMCF per year.

B. Facility Emissions and Attainment Status

This facility is a Major Stationary Source located in Lorain County. The area is designated attainment for carbon monoxide, nitrogen oxides, sulfur dioxide, ozone and lead. Lorain County is designated as a Group II Attainment Area for PM10 particulate.

C. Source Emissions

Potential emissions of NOx from the new source will exceed the emission threshold limit of 40 tons per year and would trigger PSD. The actual emissions from this emissions unit for years 1998 and 1999 were 5.11 and 4.31 TPY, with a two year average emission of 4.71 TPY. The PTI will contain terms and conditions which limit the natural gas fuel usage to 287 MMCF per year. Allowable emissions of NOx are 21.53 tons per year.

Contemporaneous Emission Increases and Decreases

NEW SOURCE REVIEW FORM B

PTI Number: 02-14110 Facility ID: 0247080961

FACILITY NAME Lorain Tubular Company LLC

FACILITY DESCRIPTION #2 Reheat Furnace CITY/TWP Lorain

Installation of the new burners on the No. 2 Reheat Furnace (P037) and a contemporaneous emission increase from the Walking Beam Reheat Furnace (P001) under PTI # 02-13781, issued April 26, 2000, at the facility will result in net emission increases and decreases as follows:

| | <u>NOx (Tons Per Year)</u> |
|--|----------------------------|
| Modified No. 2 Reheat furnace (P037) | 21.53 |
| Contemporaneous emission decrease (P037) | (4.71) |
| Contemporaneous emission increase (P001) | 22.21 |
| ----- | |
| Net Emission Change | 39.03 |
| ----- | |
| Significance Level | 40 |

D. Conclusion

Installation of the new burners on the No. 2 Reheat Furnace which increases the burner capacity from 58.8 MMBtu/hr to 77.8 MMBtu/hr and limiting the natural gas fuel usage to 287 MMCF/yr will result in allowable emissions of 21.53 tons of NOx per year. The net increase in emissions of NOx are less than the PSD threshold limit for this pollutant. Therefore, the requirements of PSD do not apply to the installation of the new burners on the No. 2 Reheat Furnace in No. 3 Seamless Mill.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| NOx | 21.53 |
| CO | 12.0 |
| OC | 1.58 |
| PE | 1.10 |
| SO2 | 0.09 |

NEW SOURCE REVIEW FORM B

PTI Number: 02-14110 Facility ID: 0247080961

FACILITY NAME Lorain Tubular Company LLC

FACILITY DESCRIPTION #2 Reheat Furnace CITY/TWP Lorain

NEW SOURCE REVIEW FORM B

PTI Number: 02-14110

Facility ID: 0247080961

FACILITY NAME Lorain Tubular Company LLC

FACILITY DESCRIPTION #2 Reheat Furnace

CITY/TWP Lorain