State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
LORAIN COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 02-15543

DATE: 11/29/2001

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

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

CC: USEPA **NEDO**

FINAL PERMIT TO INSTALL 02-15543

Application Number:	02-15543
APS Premise Number:	0247080961
Permit Fee:	**$1800**
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):
Quench and Temper heat-treat line Austenizing Furnace, Quench and Temper heat-treat line Tempering Furnace, and a Scale Storage Pile.

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

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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.10 below if no deviations occurred during the quarter.

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.

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 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.

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.

11. 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.

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

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

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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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).

9. 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.

10. 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)

Pollutant	Tons Per Year
NOx	39.40
CO	53.40
OC	7.01
PE/PM10	1.52
SO2	0.38

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

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Load-in and load-out of storage (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05	there shall be no visible emissions except for one minute in any hour best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b, A.2.c and A.2.f)
Wind erosion from storage piles (see Section A.2.a for identification of storage piles)	OAC rule 3745-31-05	there shall be no visible emissions except for one minute in any hour best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.d, through A.2.f)
Load-in and load-out of storage piles, and wind erosion from storage piles	OAC rule 3745-31-05	particulate emissions shall not exceed 0.30 tpy
	OAC rule 3745-17-07 (B)(6)	the emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-08 (B),(B)(6)	the emissions 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 The storage pile that is covered by this permit and subject to the above-mentioned requirements are listed below:

Scale storage pile

2.b The permittee shall employ best available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee has committed to ensure that the load-in and load-out material will have an inherently high moisture content of at least 7% and minimize the drop height distance from front-end loader(s) to stock piles and/or truck beds to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage piles if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

2.d The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee has committed to ensure that the load-in and load-out material will have an inherently high moisture content of at least 7% to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

2.f 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 3745-17-08 and 3745-31-05.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-in inspection frequency
all	weekly

2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-out inspection frequency
all	weekly

3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification	minimum wind erosion inspection frequency
all	weekly

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

5. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, 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.

7. The permittee shall maintain records of the following information:

   a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

   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 days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

   The information required in 8.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

8. 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 limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:

   a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

   b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

2. The permittee shall submit required reports in the following manner:

   a. Reports of any required monitoring and/or recordkeeping 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 emissions limitations, operational restriction, 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 the 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.)

V. Testing Requirements

1. Emission limitation:

0.3 tons of PE/PM10 per year

Applicable compliance method:

Compliance can be determined by the following equations:

$E = k\ (0.0032)[(U/5)^{1.3} / (M/2)^{1.4}]$ (AP-42, section 13.2.4, Eq (1)) (January, '95 version), load-in

Where: E = emission factor (lb/ton)
k = 0.74 (particle size multiplier for PM < 30 mm, dimensionless)
U = 10.8 mph (mean wind speed, 10.8 mph for Lorain City)
M = material moisture content (%)

Wind Erosion Calculation: (AP-42, section 11.2.3, Eq (3)) (May, '83 version)

$E = 1.7\ (s/1.5)[(365-p)/235](f/15)$ (lb/day/acre)

Where: E = total suspended particulate emission factor
s = silt content of aggregate (%) (13%)
p = number of days with > or = to 0.25 mm (0.01 in.) of precipitation per year (150 days)
f = percentage of time that the unobstructed wind speed exceeds 5.4 m/s (12 mph)

at the mean pile height. (Assume 30%)

The calculated emission factors (E) shall be added and multiplied by the annual 12-month summation of aggregate through-put and dividing by 2,000 lbs/ton.

2. Emission limitation:

One (1) minute of visible emission

Compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standard of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraph (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

VI. Miscellaneous Requirements

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F004 - Scale Storage Pile		

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

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Natural gas fired Austenitizing Re-heat Furnace (50 MMBtu/hr) for quench and temper heat-treat line	OAC rule 3745-31-05 (A)(3)	Emissions from natural gas usage in this emissions unit shall not exceed: NOx: 0.072 lb/MMBtu, as measured @ maximum firing condition; 3.60 lbs/hr , 15.80 tpy CO: 4.20 lbs/hr, 18.40 tpy; OC: 0.55 lb/hr, 2.41 tpy; PE: 0.10 lb/hr, 0.42 tpy; SO_2: 0.03 lb/hr, 0.13 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

II. Operational Restrictions

1. The permittee shall use only natural gas as fuel for this emissions unit.

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.

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.

V. Testing Requirements

1. Emission Limitation:

   0.072 lb of NOx per MMBtu (measured @ maximum firing condition)

   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 fields 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.

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:

3.60 lbs of NOx 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 50 MMBtu/hr.

3. Emission Limitation:

15.80 tons of NOx per year

Applicable Compliance Method:

Compliance shall be determined based upon the following formula:

Compliance shall be determined by multiplying the hourly NOx emission rate (in pounds per hour) from the most recent compliance stack emission test by 8,760 hours per year and dividing by 2,000 lbs/ton.

4. Emission Limitation:

4.20 lbs/hr of CO

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum heat input of 50 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:

18.40 tons of CO per year

Applicable Compliance Method:

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 438 MMcf and dividing by 2,000 lbs/ton.

6. Emission Limitation:

   0.55 lb/hr of OC

   Applicable Compliance Method:

   Compliance shall be determined by multiplying the maximum heat input of 50 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.

7. Emission Limitation:

   2.41 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 438 MMcf and dividing by 2,000 lbs/ton.

8. Emission Limitation:

   0.10 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:

   0.42 tons of particulate matter per year

   Applicable Compliance Method:

   Compliance shall be determined by multiplying the emission factor of 1.9 lb/MM scf (from AP-42, Table 1.4-1, 7/98 version) by the maximum annual natural gas fuel usage of 438 MMcf and dividing by 2,000 lbs/ton.

10. Emission Limitation:

    0.03 lb/hr of SO_2

    Applicable Compliance Method:

    Compliance shall be determined by multiplying the actual heat input of 50 MMBtu/hr by the emission factor of 0.6 lb of SO_2/MM scf (from AP-42, Table 1.4-2, 7/98 version) and dividing by 1000 Btu.

11. Emission Limitation:

    0.13 ton of SO_2 per year

    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 438 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

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P002- Natural gas fired Austenitizing Re-heat Furnace (50 MMBtu/hr) for quench and temper heat-treat line		

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

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Natural gas fired Tempering Re-heat Furnace (112 MMBtu/hr) for quench and temper heat-treat line	OAC rule 3745-31-05 (D)	NOx: 28.36 tons per rolling 12-month period
	OAC rule 3745-31-05 (A)(3)	NOx: 0.068 lb/MMBtu, as measured at maximum firing conditions, 7.62 lbs/hr, 28.36 tpy; CO: 9.41 lbs/hr, 35.0 tpy OC: 1.23 lb/hr, 4.59 tpy PE: 0.21 lb/hr, 0.79 tpy SO_2: 0.07 lb/hr, 0.25 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

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 834 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:

Month	Maximum Allowable Cumulative Fuel Usage
1	69.50 MMCF
1-2	139.00 MMCF
1-3	208.50 MMCF
1-4	278.00MMCF
1-5	347.50 MMCF
1-6	417.00 MMCF
1-7	486.50 MMCF
1-8	556.00 MMCF
1-9	626.50 MMCF
1-10	695.00 MMCF
1-11	764.50 MMCF
1-12	834.00 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:

0.068 lb of NOx per MMBtu (measured @ maximum firing condition)

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 fields 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.

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:

7.62 lbs of NOx 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 112 MMBtu/hr.

3. Emission Limitation:

28.36 tons of NOx per rolling 12-month period

Applicable Compliance Method:

After the initial 12 calendar months of operation following the issuance of this permit, compliance shall be determined by multiplying the results of the most recent compliance test (lb/MMBtu) by the actual natural gas usage (MMCF), calculated each rolling 12-months. The product shall then be multiplied by 1000 BTU/CF and divided by 2,000 lbs/ton. Until the first 12 months of operation have passed, compliance with this limit shall be demonstrated by maintaining natural gas usage to the limits contained in the table in Section A.II.2.

4. Emission Limitation:

9.41 lbs/hr of CO

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum heat input of 112 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:

35.0 tons of CO per year

Applicable Compliance Method:

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 actual annual natural gas usage and dividing by 2,000 lbs/ton.

6. Emission Limitation:

   1.23 lb/hr of OC

   Applicable Compliance Method:

   Compliance shall be determined by multiplying the maximum heat input of 112 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.

7. Emission Limitation:

   4.59 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 actual annual natural gas usage and dividing by 2,000 lbs/ton.

8. Emission Limitation:

   0.21 lb/hr of PE

   Applicable Compliance Method:

   If required by the 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:

   0.79 tons of particulate matter per year

   Applicable Compliance Method:

   Compliance shall be determined by multiplying the emission factor of 1.9 lb/MM scf (from AP-42, Table 1.4-1, 7/98 version) by the actual annual natural gas usage and dividing by 2,000 lbs/ton.

10. Emission Limitation:

0.07 lb/hr of SO_2

Applicable Compliance Method:

Compliance shall be determined by multiplying the actual heat input of 112 MMBtu/hr by the emission factor of 0.6 lb of SO_2/MM scf (from AP-42, Table 1.4-2, 7/98 version) and dividing by 1000 Btu.

11. Emission Limitation:

0.25 ton of SO_2 per year

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 actual annual natural gas usage 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

None

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Natural gas fired Tempering Re-heat Furnace (112 MMBtu/hr) for quench and temper heat-treat line		

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: 02-15543 Facility ID: 0247080961

FACILITY NAME Lorain Tubular Company LLC

FACILITY DESCRIPTION Steel Facility CITY/TWP Lorain

SIC CODE 3317 **SCC CODE** 3-03-009-99 **EMISSIONS UNIT ID** F004

EMISSIONS UNIT DESCRIPTION Scale Storage Pile

DATE INSTALLED 11/2002

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	attainment		0.3005		0.3005
PM_{10}					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
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: 0.3005 ton per year, no visible emissions except for one minute in any hour Basis: AP-42, similar sources

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: 02-15543 Facility ID: 0247080961

FACILITY NAME Lorain Tubular Company LLC

FACILITY DESCRIPTION Steel Facility CITY/TWP Lorain

Emissions Unit ID: P003

SIC CODE 3317 **SCC CODE** 3-03-009-33 **EMISSIONS UNIT ID** P002

EMISSIONS UNIT DESCRIPTION Austenitizing Reheat Furnace

DATE INSTALLED 11/2002

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	attainment	0.10 lb/hr	0.42	0.10 lb/hr	0.42
PM_{10}					
Sulfur Dioxide	attainment	0.03 lb/hr	0.13	0.03 lb/hr	0.13
Organic Compounds	attainment	0.55 lb/hr	2.41	0.55 lb/hr	2.41
Nitrogen Oxides	attainment	0.072 lb/MMBtu, 3.60 lbs/hr	15.80	0.072 lb/MMBtu, 3.60 lbs/hr	15.80
Carbon Monoxide	attainment	4.20 lbs/hr	18.40	4.20 lbs/hr	18.40
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: 0.072 lb of NOx/MMBtu, visible particulate emissions of less than 5% opacity as a 6-minute average
Basis: Manufacturer's data, AP-42, state regulations, similar sources

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: 02-15543 Facility ID: 0247080961

FACILITY NAME Lorain Tubular Company LLC

FACILITY DESCRIPTION Steel Facility CITY/TWP Lorain

Emissions Unit ID: P003

SIC CODE 3317 **SCC CODE** 3-03-009-33 **EMISSIONS UNIT ID** P003

EMISSIONS UNIT DESCRIPTION Tempering Reheat Furnace

DATE INSTALLED 11/2002

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	attainment	0.21 lb/hr	0.79	0.21 lb/hr	0.79
PM_{10}					
Sulfur Dioxide	attainment	0.07 lb/hr	0.25	0.07 lb/hr	0.25
Organic Compounds	attainment	1.23 lbs/hr	4.59	1.23 lbs/hr	4.59
Nitrogen Oxides	attainment	0.068 lb/MMBtu, 7.62 lbs/hr	28.36	0.068 lb/MMBtu, 7.62 lbs/hr	28.36
Carbon Monoxide	attainment	9.41 lbs/hr	35.0	9.41 lbs/hr	35.0
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: 0.068 lb of NOx/MMBtu, 834 MMCF/yr of natural gas fuel usage limitation, visible particulate emissions of less than 5% opacity as a 6-minute average

Basis: Manufacturer's data, AP-42, state regulations, similar sources

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: _____