

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

Permit To Install **02-21883**

A. Source Description

WCI Steel, Inc., has applied for a synthetic minor permit to install (PTI) for a boiler, two steel pickling lines, and a galvanizing line at its facility located at 1040 Pine Avenue, SE, in Warren, Ohio. Based on calculated potential emissions without controls, the facility would be a major source of Hazardous Air Pollutants (HAPs) and the would be subject to 40 CFR Part 63, Subpart FFFFF, the MACT standard for integrated iron and steel manufacturing. However, see Section C below for limitations. The facility is located in Trumbull County.

B. Facility Emissions and Attainment Status

The boiler, two steel pickling lines, and galvanizing line at the facility emit HAPs. Calculated maximum potential single HAP and combined HAP emissions for the facility exceed 10 and 25 tons per year, respectively. Trumbull County is non-attainment for ozone.

C. Source Emissions

WCI Steel, Inc., has proposed to limit HAP emissions facility-wide to 9.75 tons per year of each single HAP and 24.5 tons per year of total combined HAPs by limiting coal usage in the boiler and operating hours for the two steel pickling lines and galvanizing line. This PTI will contain terms and conditions to establish these limits.

D. Conclusion

This PTI will limit HAP emissions by limiting facility-wide HAP emissions over a rolling, 12-month period to 9.75 tons per year of each single HAP (HCl) and 24.5 tons per year of total combined HAPs by limiting coal usage in the boiler and operating hours for the two steel pickling lines and galvanizing line. WCI Steel, Inc., will be required to record the monthly emissions of each single HAP from the boiler, two steel pickling lines, and the galvanizing line, and all total combined HAPs from all sources of HAPs at the facility. WCI Steel, Inc., will also be required to record the monthly coal usage and maintain coal usage records over a rolling, 12-month period and monthly operating hours for the two steel pickling lines and the galvanizing line and maintain records of operating hours over a rolling, 12-month period. Exceedance reports will be submitted if necessary. In this way, the facility will address the issue of 40 CFR Part 63, Subpart FFFFF, by not being major for HAPs.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
TRUMBULL COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 02-21883

Fac ID: 0278000463

DATE: 3/29/2006

WCI Steel, Inc
Thomas Shepker
1040 Pine Ave SE
Warren, OH 44483

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 **\$2850** 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.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NEDO

Eastgate Dev. & Trans. Study

WV

PA

TRUMBULL COUNTY

**PUBLIC NOTICE AND PUBLIC HEARING
OHIO ENVIRONMENTAL PROTECTION AGENCY
ISSUANCE OF DRAFT SYNTHETIC MINOR
PERMIT TO INSTALL TO WCI STEEL, INC.**

Public notice is hereby given that the Ohio Environmental Protection Agency (EPA) has issued, on March 29, 2006, a draft action of Permit-to-Install (PTI) application number 02-21883 to WCI Steel, Inc. The draft permit proposes to allow voluntary restrictions to restrict the potential to emit of hazardous air pollutants at the facility located at 1040 Pine Avenue SE, Howland Township, Ohio, 44483.

The purpose of this notice is (1) to provide interested parties with the opportunity to submit comments concerning the draft permit, and (2) to announce the date, time and location of a public hearing concerning the draft permit.

This project, if approved, will result in actual emissions reductions in plant-wide emissions for the purpose of avoiding federal based Maximum Achievable Control Technology requirements. The proposed allowable criteria pollutant air emission rates for the new sources and the net increase or decrease associated with this project are as follows:

<u>Pollutant</u>	<u>Permit Allowable</u> (in tons per year)
total HAP	24.5
HCl	9.75

Written comments on the draft permit must be received by the close of business Friday, May 5, 2006. Comments received after this date will not be considered to be a part of the official record. Written comments may be submitted at the hearing (if it is held) or sent to: Kristen Switzer, Ohio EPA Northeast District Office, 2110 E Aurora Road, Twinsburg, Ohio 44087.

A public hearing on the draft air permit will be held on Thursday, May 4, 2006, at the at Warren Township Administration Building, 3765 West Market St., Leavittsburg, OH 44430. The public hearing will commence at 6:30 p.m. to accept comments on the draft permit. A presiding officer will be present and may limit oral testimony to ensure that all parties are heard.

All interested persons are entitled to attend or be represented and give written or oral comments on the draft permit at the hearing.

Copies of the draft permit application and technical support information may be reviewed and/or copies made by first calling to make an appointment at Ohio EPA Northeast District Office, located at the above address, telephone number (330) 963-1200.



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-21883

Application Number: 02-21883
Facility ID: 0278000463
Permit Fee: **To be entered upon final issuance**
Name of Facility: WCI Steel, Inc
Person to Contact: Thomas Shepker
Address: 1040 Pine Ave SE
Warren, OH 44483

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1040 Pine Ave SE
Howland Twp, Ohio**

Description of proposed emissions unit(s):
Synthetic minor modification for several emissions units.

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

WCI Steel, Inc

Facility ID: 0278000463

PTI Application: 02-21883

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

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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

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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 re-issuance, or modification
- 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, 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 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.

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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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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

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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 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 ninety (90) 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.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in

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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 shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting 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 (i.e., postmarked) quarterly, 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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of

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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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. 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)

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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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

WCI Steel, Inc**Facility ID: 0278000463****PTI Application: 02-21883****Issued: To be entered upon final issuance****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>
HCl	9.75
Combined HAPs	24.5

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

1. The emissions of the combined HAPs from emissions units B001, B002, B004, F001, F002, F005, F006, F007, F008, F011, F012, F013, F014, F015, F020, F021, F022, G001, K001, L025, P001, P002, P003, P005, P011, P016, P017, P026, P027, P028, P029, P034, P035, P036, P037, P038, P039, P040, P901, P902, P903, P905, P906, R001, and all other emission sources at the facility, including but not limited to de minimis, exempt, and combustion sources, shall not exceed 24.5 tons per year, based upon a rolling, 12-month summation.
2. During the first twelve (12) calendar months of operation following the effective date of this federally enforceable state operating permit, the cumulative number of tons of emissions of combined HAPs shall not exceed the cumulative total number of tons of emissions of combined HAPs as specified for each month in the following table:

Month: Cumulative Number of Tons of Combined HAP Emissions:

1	6.2
2	7.9
3	9.6
4	11.3
5	13.0
6	14.7
7	16.4
8	18.1
9	19.8
10	21.5
11	23.2
12	24.5

3. The permittee shall collect and record the following information for each month:
 - a. For emissions units P002, P003, and P906 (pickling lines and galvanizing line, respectively):
 - i. The total single HAP (HCl) emissions (see Sections III.A.IV.3 for both emissions units P002 and P003 and Section III.A.IV.5 for emissions unit P906).

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- b. For emissions unit B001:
 - i. The total single HAP (HCl) emissions (see Section III.A.IV.6 for emissions unit B001).
- c. For all combustion sources of HAPs (organic HAPs and metal HAPs) at the facility:
 - i. The total volume of natural gas burned;
 - ii. The total volume of coke oven gas burned;
 - iii. The total volume of fuel oil burned;
 - iv. The total volume of blast furnace gas burned;
 - v. The total quantity of coal burned;
 - vi. The total HAP emissions from natural gas calculated using emission factors of 0.0056 lb/mmcf (metal HAPs) and 1.88 lb/mmcf (organic HAPs) from AP-42, Section 1.4, 7/98 or any later edition;
 - vii. The total HAP emissions from coke oven gas calculated using an emission factor of 0.062 lb/mmcf (metal HAPs) based upon an emission factor for particulate emissions from AP-42, Section 12.5, 10/86 or any later edition, and the assumption that 1 percent of particulate emissions are metal HAPs from the background document for 40 CFR Part 63, Subpart FFFFF and an emission factor of 0.408 lb/mmcf (organic HAPs) based upon an emission factor for volatile organic compounds (VOCs) from AP-42, Section 12.5, 10/86 or any later edition and the assumption that 34 percent of VOCs are organic HAPs (same as natural gas);
 - viii. The total HAP emissions from fuel oil calculated using an emission factor of 0.104 lb/1000 gallons (metal HAPs) and 0.041 lb/1000 gallons (organic HAPs) from AP-42, Section 1.3, 9/98 or any later edition;
 - ix. The total HAP emissions from blast furnace gas calculated using an emission factor of 0.0044 lb/mmcf for metal HAPs based upon emission testing for particulate emissions performed on 10/21/91, a heat value of 85 btu/cf, and the assumptions that 0.2 percent of the particulate emissions are manganese and 0.4 percent of the particulate emissions

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are metal HAPs (organic HAP emissions are assumed to be zero for the combustion of blast furnace gas);

- x. The total HAP emissions from coal calculated using an emission factor of 0.00037 lb/ton (metal HAPs) from particulate emission testing performed on 12/17/03 and the assumption that 0.043 percent of the particulate emissions are metal HAPs based upon boiler fly ash data and 0.0033 lb/ton (organic HAPs) from AP-42, Section 12.5, 10/86 or any later edition; and
 - xi. The total combined HAP emissions for all combustion sources at the facility [summation of II.A.3.b.vi, II.A.3.b.vii, II.A.3.b.viii, II.A.3.b.ix, and II.A.3.b.x for all HAPs] per rolling 12-month period.
- d. For emissions unit G001 (gasoline dispensing station):
- i. The total volume of gasoline dispensed; and
 - ii. The total HAP (organic HAP) emissions from the gasoline dispensing station calculated using an emission factor of 20 lb/1000 gallon from AP-42, Section 5.2, 1/95 or any later edition, and the assumption that 100 percent of VOC emissions are organic HAPs.
- e. For emissions unit K001 (silicon coating line):
- i. The number of hours of operation for each VOC-containing coating;
 - ii. The VOC content and relative portion of organic HAPs of each coating employed; and
 - iii. The total HAP (organic HAP) emissions from the silicon coating line calculated using an emission factor of 4.2 pound VOC per hour of operation based upon emission testing for VOC emissions performed on 12/13/94 and the assumption that 100 percent of the HAP in the coating lost as emissions.
- f. For all non-combustion sources of HAPs (metal HAPs) including F002, F005, F006, F007, F008, F012, F013, F014, F015, F021, F022, P026, P027, P028, P901, P902, P903, P905, all de minimis, exempt, and other non-combustion sources:

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- i. The quantity of steel produced;
 - ii. The total metal HAP emissions from all non-combustion sources calculated based upon:
 - (a) The manganese emissions from emissions unit P902 and P903 (BOF vessels) using:
 - (i) An emission factor of 0.122 pounds of stack particulate emissions per ton of steel produced, from emissions testing performed on June 13, 2003;
 - (ii) An emission factor of 0.5 pound of fugitive particulate emissions per ton of steel produced from AP-42, Section 12.5, 10/86 or any later edition; and
 - (iii) The assumption that 1.03 percent of total particulate emissions from P902 and P903 are metal HAPs, based upon chemical analysis of BOF precipitator dust;
 - (b) The assumption that manganese emissions from P902 and P903 are (at least) 70 percent of the manganese emissions from all non-combustion sources, based upon chemical analysis of various associated solids or solid waste streams; and
 - (c) The assumption that total metal HAP emissions (including manganese) are 1.30 percent of total manganese emissions, based upon chemical analysis showing that other metal HAPs are no more than 30 percent manganese.
 - g. The total combined HAP emissions for all emissions units of each single HAP and total combined HAPs [summation of all single HAP and combined HAP emissions in II.A.3.a through II.A.3.f] per rolling 12-month period.
4. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month emissions of combined HAPs from all emissions units at the facility exceeded 24.5 tons per year, and the actual rolling, 12-month emissions of combined HAPs for each such month.
 5. The permittee shall submit annual reports which summarize the facility-wide emissions of each single HAP and combined HAPs from all emissions units at the facility. The reports shall include emission calculations, be submitted by January 31 of each year, and cover the previous calendar year.

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

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Issued: To be entered upon final issuance

None

Facility ID: 0278000463

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>
B001 - 492 mmBtu/hr boiler fired with coal, natural gas, blast furnace gas, and coke oven gas with a baghouse for controlling particulate emissions when burning coal and a wet scrubber for controlling hydrochloric acid emissions when burning coal	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)(1)	See A.I.2.a and A.I.2.c below.
	OAC rule 3745-17-10(C)(1)	See A.I.2.b below.
	OAC rule 3745-18-84(J)	Sulfur dioxide emissions shall not exceed 3.9 lbs/mmBtu actual heat input. See A.III.5 and A.III.6 below.
	OAC rule 3745-31-02(A)(2)	HCl emissions from the wet scrubber outlet associated with this emissions unit (B001) shall not exceed 0.20 lb/mmBtu actual heat input.
		HCl emissions from the wet scrubber outlet associated with this emissions unit (B001) shall not exceed 6.75 tons per year, based upon a rolling, 12-month summation. See Sections A.II.4 and A.II.5 below.
		See Part II, Section A, of these terms and conditions for facility-wide restrictions of hazardous air pollutants (HAPs).

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Issue

Facility ID: 0278000463

Emissions Unit ID: B001

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2. Additional Terms and Conditions

- 2.a** Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input except when burning coal, when co-firing coal with any gaseous fuel, or when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.
- 2.b** Particulate emissions shall not exceed 0.10 pound per million Btu of actual heat input when burning coal or when co-firing coal with any gaseous fuels. This limit was obtained from curve P-1 in Figure I of OAC rule 3745-17-10 using a total heat input of 879 mmBtu/hr, which is the combined total heat input from emissions units B001 and B002.
- 2.c** Particulate emissions shall not exceed 0.040 pound per million Btu of actual heat input when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.

II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation and is burning coal. The pressure drop shall not be considered outside the normal range when the pressure drop falls below the minimum point in the pressure differential range as a result of bag replacements.

The permittee may petition the Northeast District Office for reestablishment of the pressure drop range at any time provided the permittee can demonstrate to the Northeast District Office that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

- 2. The coal burned in this emissions unit shall have a sulfur content, on a dry basis, that is sufficient to comply with the allowable sulfur dioxide emission limitation of 3.9 pounds sulfur dioxide/mmBtu actual heat input.

Compliance with the above-mentioned specification shall be based upon the analytical results for the composite sample of coal collected during each calendar month.

- 3. The permittee shall burn only natural gas, coal, blast furnace gas, and coke oven gas (COG) in this emissions unit.
- 4. In order to comply with the annual HCl emission limitation of 6.75 tons per year from

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Emissions Unit ID: B001

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the wet scrubber outlet associated with this emissions unit (B001), the annual cumulative HCl emissions shall not exceed 6.75 tons, based upon a rolling, 12-month summation. During the first twelve (12) calendar months of operation of this emissions unit following the effective date of this permit, the cumulative number of pounds of HCl emissions shall not exceed the cumulative total number of tons of HCl emissions as specified for each month in the following table:

Month:	Cumulative Number of Tons:
1	0.6
2	1.2
3	1.8
4	2.4
5	3.0
6	3.6
7	4.2
8	4.8
9	5.4
10	6.0
11	6.6
12	6.75

5. In order to ensure compliance with the annual HCl emission limitation of 6.5 tons per year from the wet scrubber outlet associated with this emissions unit (B001), the annual cumulative number of tons of coal burned in this emission unit shall not exceed 51,912 tons, based upon a rolling, 12-month summation. During the first twelve (12) calendar months of operation of this emissions unit following the effective date of this permit, the cumulative number of tons of coal burned shall not exceed the cumulative total number of tons of coal burned as specified for each month in the following table:

Month:	Cumulative Number of Tons of Coal Burned:
1	4615.4
2	9230.8
3	13,846.2
4	18,461.5
5	23,076.9
6	27,692.3
7	32,307.7
8	36,923.1
9	41,538.5

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10	46,153.8
11	50,769.2
12	51,912.0

6. The air emissions from this boiler shall be vented to a wet scrubber with a 95 percent overall reduction of HCl by weight when burning coal.
7. The wet scrubber water flow rate shall be continuously maintained at a value of not less than the rate specified by the scrubber manufacturer in gallons per minute at all times while coal is being combusted in this emissions unit. With Ohio EPA's written approval, the minimum water flow rate shall be maintained at the value established during a compliance test in lieu of the rate specified by the scrubber manufacturer in gallons per

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minute beginning after the first compliance test demonstrating compliance with 95% removal efficiency of the scrubber. The permittee shall comply with the minimum water flow rate approved by Ohio EPA until Ohio EPA approves a minimum water flow rate derived from additional emissions testing.

8. All COG burned in this emissions unit shall be processed through a desulfurization unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with all specifications outlined in 40 CFR Part 60, Appendix B, "Performance Specification Test (PST) 1", as such appendix existed on July 1, 2002. [OAC rule 3745-17-03(C)(1)] See A.VI.1.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, "Performance Specification Test 1", as such appendix existed on July 1, 2002. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, operating manual(s), and/or the permittee's operational experience for similar sources. The permittee shall record the pressure drop across the baghouse on weekly basis when the emissions unit is operating.
3. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were

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received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The analytical methods for sulfur content shall be the most recent version of: Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isooperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

4. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content and heat content, and the average sulfur dioxide emission rate for coal, recorded as pounds SO₂/MMBtu actual heat input.
5. Monitoring and record keeping for the sulfur content is not required for coke oven gas because the sulfur dioxide emission rate from the burning of undesulfurized coke oven gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
6. Monitoring and record keeping for the sulfur content is not required for blast furnace gas because the sulfur dioxide emission rate from the burning of blast furnace gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
7. Monitoring and record keeping for the sulfur content is not required for natural gas because the sulfur dioxide emission rate from the burning of natural gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
8. For each day during which the permittee burns a fuel other than natural gas, coal, blast furnace gas, and coke oven gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
9. The permittee or the permittee's supplier shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar quarter, the representative samples of coal from all shipments of coal which were received during that calendar quarter shall be combined into one composite sample.

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Each monthly composite sample of coal shall be analyzed for chlorine content (percent) and heat content (Btu/pound of coal). The analytical methods for chlorine content shall be the most recent version of: D2361-95(2001) Standard Test Method for Chlorine in Coal. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

10. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for chlorine content and heat content, and the average HCl emission rate for coal, recorded as pounds HCl/mmBtu actual heat input.
11. The permittee shall properly operate and maintain equipment to continuously monitor the water flow rate across the wet scrubber while the emissions unit is in operation and coal is being burned. The monitoring device used to monitor the water flow rate across the wet scrubber shall be certified to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year. The monitoring device and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information each shift while the wet scrubber is operating:

- a. the wet scrubber water flow rate, in gallons per minute; and
- b. the operating times, in hours (the time of day that operation begins and ends), for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- c. the operating times, in hours (the time of day that coal combustion begins and ends), for all instances when coal is being combusted in the boiler.

IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy or electronic format) following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason,

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and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse was not within the allowable range specified above.
3. Quarterly reports shall be submitted concerning the analytical results of the composite coal samples and the quantities of the coal received for this emissions unit.

The quarterly reports shall include the following information for each month during the calendar quarter:

- a. the total quantity of coal received (tons);
- b. the average sulfur content (percent) of the coal received;
- c. the average heat content (Btu/pound) of the coal received; and
- d. the average sulfur dioxide emission rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year, unless otherwise specified by the appropriate Ohio EPA District Office or local air agency, and shall cover the data obtained during the previous calendar quarters.

4. The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas, coal, blast furnace gas, and/or coke oven gas was burned in this emissions unit.
5. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the wet scrubber water flow rate was not maintained at or above the required level while coal was being burned in this emissions unit.

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6. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month emissions of HCl from this emissions unit exceeded 6.75 tons per year, and the actual rolling, 12-month emissions of HCl for each such month.
7. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month number of tons of coal burned in this emissions unit exceeded 51,912 tons per year, and the actual rolling, 12-month number of tons of coal burned for each such month.
8. The permittee shall submit deviation (excursion) reports that identify all periods of time during which COG burned in this emissions unit was not processed through a COG desulfurization unit.

V. Testing Requirements

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

- a. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input except when burning coal, when co-firing coal with any gaseous fuel, or when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.

Applicable Compliance Method:

- (i) To determine the actual particulate emission rate for natural gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu}) = 0.0018 \text{ lb/mmBtu}$$

Where:

E = particulate emission rate from natural gas, in lb/mmBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate matter from burning natural gas, from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

- (ii) To determine the particulate emission rate for coke oven gas, the permittee may use the emission factor of 0.012 lb particulate/mmBtu from AP42, Section 12.5 Iron and Steel Production, Table 12.5-1, 10/86.

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- (iii) If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

c. Emission Limitation:

Particulate emissions shall not exceed 0.10 pound per million Btu of actual heat input when burning coal or co-firing coal with any gaseous fuel.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).

d. Emission Limitation:

Particulate emissions shall not exceed 0.040 pound per million Btu of actual heat input when burning blast furnace gas or any mixture of blast furnace gas and other gaseous fuels.

Applicable Compliance Method:

- (i) To determine the actual particulate emission rate for natural gas, the following equation may be used:

$$E \text{ (lb/mmBtu)} = (1.9 \text{ lb}/10^6 \text{ scf}) \times (1 \text{ scf}/1073 \text{ Btu}) \times (1,000,000 \text{ Btu/mmBtu}) = 0.0018 \text{ lb/mmBtu}$$

Where:

E = particulate emission rate from natural gas, in lb/mmBtu;

1.9 lb/10⁶ scf = emission factor for filterable particulate matter from burning natural gas, from AP42, Section 1.4 Natural Gas Combustion, Table 1.4-2, 7/98;

1 scf/1073 Btu = the heat value of 1 scf of natural gas; and

1,000,000 Btu/mmBtu = conversion from Btu to mmBtu.

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- (ii) To determine the particulate emission rate for coke oven gas, the permittee may use the emission factor of 0.012 lb particulate/mmBtu from AP42, Section 12.5 Iron and Steel Production, Table 12.5-1, 10/86.
 - (iii) The permittee may use a value of 0.015 lb particulate/mmBtu for the particulate emission rate for blast furnace gas. The value of 0.015 lb/mmBtu was obtained from emission testing on 10/21/91 of emissions unit B004 while burning only blast furnace gas.
 - (iv) If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(9).
- e. Emission Limitation:
- Sulfur dioxide emissions shall not exceed 3.9 lbs/mmBtu actual heat input.
- Applicable Compliance Method:
- (i) The record keeping in Section A.III of these terms and conditions shall be used to determine compliance with the SO₂ emission limitation when burning solid fuels.
 - (ii) Testing for SO₂ from natural gas is not required because the sulfur dioxide emission rate from the burning of natural gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
 - (iii) Testing for SO₂ from coke oven gas is not required because the sulfur dioxide emission rate for burning undesulfurized coke oven gas is less than the allowable sulfur dioxide emission rate in Section A.I.1 of these terms and conditions.
 - (iv) Testing for SO₂ from blast furnace gas is not required because it does not contain measurable quantities of sulfur compounds according to "Steam", 39th Edition, The Babcock & Wilcox Company, 1978, p.5-20, and "Air Pollution Engineering Manual", Air & Waste Management Association, 1992, p. 650.
 - (v) If required, the permittee shall demonstrate compliance with this emission

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rate, while burning coal, in accordance with 40 CFR Part 60, Appendix A, Methods 6 and 6C and the procedures in OAC rule 3745-18-04.

- (vi) If required, the permittee shall demonstrate compliance with this emission rate, while burning natural gas, in accordance with 40 CFR Part 60, Appendix A, Methods 6 and 6C and the procedures in OAC rule 3745-18-04.
- (vii) If required, the permittee shall demonstrate compliance with this emission rate, while burning coke oven gas, in accordance with 40 CFR Part 60, Appendix A, Methods 6 and 6C and the procedures in OAC rule 3745-18-04.
- (viii) If required, the permittee shall demonstrate compliance with this emission rate, while burning blast furnace gas, in accordance with 40 CFR Part 60, Appendix A, Methods 6 and 6C and the procedures in OAC rule 3745-18-04.

f. Emission Limitation:

HCl emissions from the wet scrubber outlet associated with this emissions unit (B001) shall not exceed 0.20 lbs/mmBtu actual heat input.

Applicable Compliance Method:

- (i) The record keeping in Section A.III of these terms and conditions shall be used to determine compliance with the HCl emission limitation when burning solid fuels.
- (ii) Testing for HCl from natural gas is not required because it does not contain measurable quantities of chlorine compounds.
- (iii) Testing for HCl from COG is not required because it does not contain measurable quantities of chlorine compounds.
- (iv) Testing for HCl from blast furnace gas is not required because it does not contain measurable quantities of chlorine compounds.
- (vi) If required, the permittee shall demonstrate compliance with this emission rate, while burning coal, in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.

g. Emission Limitation:

HCl emissions from the wet scrubber outlet associated with this emissions unit (B001) shall not exceed 6.75 tons per year, based upon a rolling, 12-month

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summation. See Sections A.II.4 and A.II.5 below.

Applicable Compliance Method:

Compliance shall be determined by multiplying the number of pounds of coal burned in this emissions unit by an emission factor of 5.2 pounds HCl per ton of coal*and multiplying that value by a heat value of 13,000 btu/pound of coal and the control efficiency of the wet scrubber determined during the most recent compliance test that demonstrated that the emissions unit was in compliance with the HCl emission limitation. Compliance shall also be determined by maintenance of a rolling, 12-month summation of HCl emissions.

*The emission factor of 5.2 pounds HCl per ton of coal is based upon the results of stack testing conducted on February 1, 2006.

h. Emission Limitation:

95 percent overall reduction of HCl by weight in the scrubber when burning coal.

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months after installation of the wet scrubber.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limit for HCl.
 - c. The emission testing shall be conducted to demonstrate compliance with the emission limitation of 95 percent overall reduction of HCl by weight *in the scrubber* when burning coal.
 - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and 26A of 40 CFR Part 60, Appendix A, or other method approved by U.S. EPA for demonstrating compliance with 40 CFR Part 63, Subpart DDDDD.

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- e. The test(s) shall be conducted while the emissions unit is burning coal and operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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.

3. 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: B001

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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>
B001 - 492 mmBtu/hr boiler fired with coal, natural gas, blast furnace gas, and coke oven gas with a baghouse for controlling particulate emissions when burning coal and a wet scrubber for controlling hydrochloric acid emissions when burning coal	None	None

2. Additional Terms and Conditions**2.a** None**II. Operational Restrictions**

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

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V. Testing Requirements

None

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VI. Miscellaneous Requirements

Emissions Unit ID: B001

None

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Emissions Unit ID: P002

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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>
P002 - Number 5 continuous steel pickling line using HCl, equipped with a wet scrubber	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-07(A)(1)
	40 CFR Part 63, Subpart CCC
	OAC rule 3745-31-02(A)(2)

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Emissions Unit ID: P002

Issued: To be entered upon final issuance

Applicable Emissions
Limitations/Control
Measures

Particulate emissions from the wet scrubber outlet from steel pickling line number 5 shall not exceed 50.2 pounds per hour. See A.I.2.e below.

Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

HCl emissions from the wet scrubber outlet from steel pickling line number 5 shall not exceed 18 parts per million by volume (ppmv). See A.I.2.a through A.I.2.d, A.II.2, and A.III.2 below.

HCl emissions from the wet scrubber outlet associated with this emissions unit (P002) shall not exceed 0.39 pound per hour.

HCl emissions from the wet scrubber outlet associated with this emissions unit (P002) and the wet scrubber

outlets associated with emissions units P003 and P906 shall not exceed 3.00 tons per year, based upon a rolling, 12-month summation. See Sections A.II.3 and A.II.4 below.

See Part II, Section A, of these terms and conditions for facility-wide restrictions of hazardous air pollutants (HAPs).

2. Additional Terms and Conditions

- 2.a The permittee shall achieve initial compliance with the requirements of 40 CFR Part 63, Subpart CCC, no later than June 22, 2001.
- 2.b If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Ohio EPA Northeast District Office may be used.
- 2.c The permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of 40 CFR Part 63, Subpart CCC.
- 2.d The permittee shall maintain a record of each inspection, including each item identified in Section A.III.2.iv, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.
- 2.e The particulate emissions limitation of 50.2 pounds per hour is based upon a process weight rate of 90 tons per hour and Table I of OAC rule 3745-17-11. If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II of OAC rule 3745-17-11 is more stringent than 50.2 lbs/hour, the permittee shall comply with the more stringent limitation.

II. Operational Restrictions

- 1. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 9.75 gallons per minute at all times while the emissions unit is in operation.
- 2. As required by section 63.6(e)(3) of 40 CFR Part 63, Subpart A, the permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the emissions unit during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the 40 CFR Part 63, Subpart CCC.
- 3. In order to comply with the annual HCl emission limitation of 3.00 tons per year from the wet scrubber outlet associated with this emissions unit (P002) and the wet scrubber outlets associated with emissions units P003 and P906, the annual cumulative HCl emissions shall not exceed 3.00 tons, based upon a rolling, 12-month summation. During the first twelve (12) calendar months of operation following the effective date of this permit, the cumulative number of tons of HCl emissions from emissions units P002,

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P003, and P906 shall not exceed the cumulative total number of tons of HCl emissions as specified for each month in the following table:

Month:	Cumulative Number of Tons:
1	0.31
2	0.63
3	0.94
4	1.25
5	1.56
6	1.88
7	2.19
8	2.50
9	2.81
10	3.00
11	3.00
12	3.00

4. In order to ensure compliance with the annual HCl emission limitation of 3.00 tons per year from the wet scrubber outlet associated with this emissions unit (P002) and the wet scrubber outlets associated with emissions units P003 and P906, the annual cumulative number of hours of operation of emissions units P002, P003, and P906 shall not exceed 15,392 hours, based upon a rolling, 12-month summation. During the first twelve (12) calendar months of operation following the effective date of this permit, the cumulative hours of operation of emissions units P002, P003, and P906 shall not exceed the cumulative total number of hours as specified for each month in the following table:

Month:	Cumulative Number of Hours:
1	1603
2	3205
3	4808
4	6410
5	8013
6	9615
7	11218
8	12820
9	14423
10	15392
11	15392

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the water flow rate across the wet scrubber while the emissions unit is in operation. The monitoring device used to monitor the water flow rate across the wet scrubber shall be certified to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year. The monitoring device and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information each shift while the wet scrubber is operating:

- a. the wet scrubber water flow rate, in gallons per minute; and
 - b. the operating times, in hours (the time of day that operation begins and ends), for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall implement an operation and maintenance plan for each emission control device by not later than the compliance date of June 22, 2001, in accordance with 40 CFR Part 63, Subpart CCC. The plan must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:
 - i. require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
 - ii. require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
 - iii. require cleaning of the scrubber internals at intervals sufficient to prevent buildup of solids or other fouling; and
 - iv. require an inspection of the scrubber at intervals of no less than 3 months with:
 - (a) cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
 - (b) repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;

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- (c) repair or replacement of droplet eliminator elements as needed;
 - (d) repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
 - (e) adjustment of damper settings for consistency with the required air flow.
3. The permittee shall maintain records for 5 years from the date of each record of:
- a. the occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - b. the occurrence and duration of each malfunction of the air pollution control equipment;
 - c. all maintenance performed on the air pollution control equipment;
 - d. actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
 - e. all information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan;
 - f. all required measurements needed to demonstrate compliance with 40 CFR Part 63, Subpart CCC, and to support the data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;
 - g. all results of initial or subsequent performance tests;
 - h. all documentation supporting initial notifications and notifications of compliance status; and
 - i. records of any applicability determination, including supporting analyses.

4. In addition to the general records required in Section A.III.3 of these terms and conditions, the permittee shall maintain records for 5 years from the date of each record of:
 - a. scrubber makeup water flow rate and recirculation water flow rate;
 - b. calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and
 - c. each maintenance inspection and repair, replacement, or other corrective action.
5. The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Ohio EPA Northeast District Office for the life of the emissions unit or until the emissions unit is no longer subject to the provisions of 40 CFR Part 63, Subpart CCC. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Ohio EPA Northeast District Office for a period of 5 years after each revision to the plan.
6. All records required by Sections A.III.3 and A.III.4 of these terms and conditions for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the wet scrubber water flow rate was not maintained at or above the required level.
2. As required by section 63.10(d)(5)(i) of 40 CFR Part 63, Subpart A, the permittee shall submit the following reports:
 - a. If actions taken by the permittee during a startup, shutdown, or malfunction of the emissions unit (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 31st day following the end of each calendar half.
 - b. Any time an action taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of section 63.10(d)(5)(ii) of 40 CFR Part 63, Subpart A.

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3. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month emissions of HCl from emissions units P002, P003, and P906 exceeded 3.00 tons per year, and the actual rolling, 12-month emissions of HCl for each such month.
4. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month number of hours of operation of emissions units P002, P003, and P906 exceeded 16,640 hours per year, and the actual rolling, 12-month number of hours of operation for each such month.

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Emissions Unit ID: P002

Issued: To be entered upon final issuance**V. Testing Requirements**

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

- a. Emission Limitation:

Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

Particulate emissions from the wet scrubber outlet from steel pickling line number 5 shall not exceed 50.2 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5 or 26A and the procedures specified in OAC rule 3745-17-03(B)(10).

- c. Emission Limitation:

HCl emissions from the wet scrubber outlet from steel pickling line number 5 shall not exceed 18 parts per million by volume (ppmv).

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.

- d. Emission Limitation:

HCl emissions from the wet scrubber outlet associated with this emissions unit

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(P002) shall not exceed 0.39 pound per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.

e. Emission Limitation:

HCl emissions from the wet scrubber outlet associated with this emissions unit (P002) and the wet scrubber outlets associated with emissions units P003 and P906 shall not exceed 3.00 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by multiplying the number of hours of operation of this emissions unit (P002) and the number of hours of operation of emissions units P003 and P906 by an emission factor of 0.39 pound HCl per hour* and maintenance of a rolling, 12-month summation of HCl emissions for emissions units P002, P003, and P906, combined.

*The emission factor of 0.39 pound HCl per hour is based upon the results of stack testing conducted on January 25-26, 2006. The emission factor was obtained by calculating the average HCl emissions from three test runs for each of emission units P002, P003 and P906, and applying an upward adjustment to the highest of those average hourly HCl emissions (the highest average hourly HCl emissions was 0.36 pound HCl per hour obtained from emissions unit P003).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted every 2.5 years in accordance with 40 CFR Part 63, Subpart CCC.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for HCl.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and 26A of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA

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

Personnel from the Ohio EPA 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.

3. 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

None

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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>
P002 - Number 5 continuous steel pickling line using HCl, equipped with a wet scrubber	None	None

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

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WCI Steel, Inc

PTI Application: 02 21002

Issue

Facility ID: 0278000463

Emissions Unit ID: P002

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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**

- 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>
P003 - Number 6 continuous steel pickling line using HCl, equipped with a wet scrubber	OAC rule 3745-17-11(B)(1)	Particulate emissions from the wet scrubber outlet from steel pickling line number 6 shall not exceed 50.2 pounds per hour. See A.I.2.e below.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
	40 CFR Part 63, Subpart CCC	HCl emissions from the wet scrubber outlet from steel pickling line number 6 shall not exceed 18 parts per million by volume (ppmv). See A.I.2.a through A.I.2.d, A.II.2, and A.III.2 below.
	OAC rule 3745-31-02(A)(2)	HCl emissions from the wet scrubber outlet associated with this emissions unit (P003) shall not exceed 0.39 pound per hour. HCl emissions from the wet scrubber outlet associated with this emissions unit (P003) and the wet scrubber

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outlets associated with emissions units P002 and P906 shall not exceed 3.00 tons per year, based upon a rolling, 12-month summation. See Sections A.II.3 and A.II.4 below.

See Part II, Section A, of these terms and conditions for facility-wide restrictions of hazardous air pollutants (HAPs).

2. Additional Terms and Conditions

- 2.a** The permittee shall achieve initial compliance with the requirements of 40 CFR Part 63, Subpart CCC, no later than June 22, 2001.
- 2.b** If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Ohio EPA Northeast District Office may be used.
- 2.c** The permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of 40 CFR Part 63, Subpart CCC.
- 2.d** The permittee shall maintain a record of each inspection, including each item identified in Section A.III.2.iv, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.
- 2.e** The particulate emissions limitation of 50.2 pounds per hour is based upon a process weight rate of 90 tons per hour and Table I of OAC rule 3745-17-11. If the emissions testing required for this emissions unit demonstrates that the

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allowable emissions rate from Figure II of OAC rule 3745-17-11 is more stringent than 50.2 lbs/hour, the permittee shall comply with the more stringent limitation.

II. Operational Restrictions

1. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 8 gallons per minute at all times while the emissions unit is in operation.
2. As required by section 63.6(e)(3) of 40 CFR Part 63, Subpart A, the permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the emissions unit during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the 40 CFR Part 63, Subpart CCC.
3. In order to comply with the annual HCl emission limitation of 3.00 tons per year from the wet scrubber outlet associated with this emissions unit (P003) and the wet scrubber outlets associated with emissions units P002 and P906, the annual cumulative HCl emissions shall not exceed 3.00 tons, based upon a rolling, 12-month summation. During the first twelve (12) calendar months of operation following the effective date of this permit, the cumulative number of tons of HCl emissions from emissions units P002, P003, and P906 shall not exceed the cumulative total number of tons of HCl emissions as specified for each month in the following table:

Month: Cumulative Number of Tons:

1	0.31
2	0.63
3	0.94
4	1.25
5	1.56
6	1.88
7	2.19
8	2.50
9	2.81
10	3.00
11	3.00
12	3.00

4. In order to ensure compliance with the annual HCl emission limitation of 3.00 tons per year from the wet scrubber outlet associated with this emissions unit (P003) and the

Emissions Unit ID: P003

wet scrubber outlets associated with emissions units P002 and P906, the annual cumulative number of hours of operation of emissions units P002, P003, and P906 shall not exceed 15,392 hours, based upon a rolling, 12-month summation. During the first twelve (12) calendar months of operation following the effective date of this permit, the cumulative hours of operation of emissions units P002, P003, and P906 shall not exceed the cumulative total number of hours as specified for each month in the following table:

Month: Cumulative Number of Hours:

1	1603
2	3205
3	4808
4	6410
5	8013
6	9615
7	11218
8	12820
9	14423
10	15392
11	15392
12	15392

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the water flow rate across the wet scrubber while the emissions unit is in operation. The monitoring device used to monitor the water flow rate across the wet scrubber shall be certified to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year. The monitoring device and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information each shift while the wet scrubber is operating:

- a. the wet scrubber water flow rate, in gallons per minute; and
 - b. the operating times, in hours (the time of day that operation begins and ends), for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall implement an operation and maintenance plan for each emission control device by not later than the compliance date of June 22, 2001, in accordance with 40 CFR Part 63, Subpart CCC. The plan must be consistent with good

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maintenance practices and, for a scrubber emission control device, must at a minimum:

- i. require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
 - ii. require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
 - iii. require cleaning of the scrubber internals at intervals sufficient to prevent buildup of solids or other fouling; and
 - iv. require an inspection of the scrubber at intervals of no less than 3 months with:
 - (a) cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
 - (b) repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
 - (c) repair or replacement of droplet eliminator elements as needed;
 - (d) repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
 - (e) adjustment of damper settings for consistency with the required air flow.
3. The permittee shall maintain records for 5 years from the date of each record of:
- a. the occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - b. the occurrence and duration of each malfunction of the air pollution control equipment;
 - c. all maintenance performed on the air pollution control equipment;
 - d. actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation)

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- when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
- e. all information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan;
 - f. all required measurements needed to demonstrate compliance with 40 CFR Part 63, Subpart CCC, and to support the data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;
 - g. all results of initial or subsequent performance tests;
 - h. all documentation supporting initial notifications and notifications of compliance status; and
 - i. records of any applicability determination, including supporting analyses.
4. In addition to the general records required in Section A.III.3 of these terms and conditions, the permittee shall maintain records for 5 years from the date of each record of:
 - a. scrubber makeup water flow rate and recirculation water flow rate;
 - b. calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and
 - c. each maintenance inspection and repair, replacement, or other corrective action.
 5. The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Ohio EPA Northeast District Office for the life of the emissions unit or until the emissions unit is no longer subject to the provisions of 40 CFR Part 63, Subpart CCC. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Ohio EPA Northeast District Office for a period of 5 years after each revision to the plan.
 6. All records required by sections A.III.3 and A.III.4 of these terms and conditions for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

IV. Reporting Requirements

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1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the scrubber water flow rate was not maintained at or above the required level.
2. As required by section 63.10(d)(5)(i) of 40 CFR Part 63, Subpart A, the permittee shall submit the following reports:
 - a. If actions taken by the permittee during a startup, shutdown, or malfunction of the emissions unit (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 31th day following the end of each calendar half.
 - b. Any time an action taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of section 63.10(d)(5)(ii) of 40 CFR Part 63, Subpart A.
3. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month emissions of HCl from emissions units P002, P003, and P906 exceeded 3.00 tons per year, and the actual rolling, 12-month emissions of HCl for each such month.
4. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month number of hours of operation of emissions units P002, P003, and P906 exceeded 16,640 hours per year, and the actual rolling, 12-month number of hours of operation for each such month.

V. Testing Requirements

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

- a. Emission Limitation:

Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

Particulate emissions from the wet scrubber outlet from steel pickling line number 6 shall not exceed 50.2 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5 or 26A and the procedures specified in OAC rule 3745-17-03(B)(10).

- c. Emission Limitation:

HCl emissions from the wet scrubber outlet from steel pickling line number 6 shall not exceed 18 parts per million by volume (ppmv).

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.

- d. Emission Limitation:

HCl emissions from the wet scrubber outlet associated with this emissions unit (P003) shall not exceed 0.39 pound per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the

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requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.

e. Emission Limitation:

HCl emissions from the wet scrubber outlet associated with this emissions unit (P003) and the wet scrubber outlets associated with emissions units P002 and P906 shall not exceed 3.00 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by multiplying the number of hours of operation of this emissions unit (P003) and the number of hours of operation of emissions units P002 and P906 by an emission factor of 0.39 pound HCl per hour* and maintenance of a rolling, 12-month summation of HCl emissions for emissions units P002, P003, and P906, combined.

*The emission factor of 0.39 pound HCl per hour is based upon the results of stack testing conducted on January 25-26, 2006. The emission factor was obtained by calculating the average HCl emissions from three test runs for each of emission units P002, P003 and P906, and applying an upward adjustment to the highest of those average hourly HCl emissions (the highest average hourly HCl emissions was 0.36 pound HCl per hour obtained from emissions unit P003).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted every 2.5 years in accordance with 40 CFR Part 63, Subpart CCC.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for HCl.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and 26A of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA

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

Personnel from the Ohio EPA 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.

3. 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

None

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PTI A

Emissions Unit ID: P003

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>
P003 - Number 6 continuous steel pickling line using HCl, equipped with a wet scrubber	None	None

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

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Issued: To be entered upon final issuance

Emissions Unit ID: P003

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PTI A

Emissions Unit ID: P906

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>	
P906 - Wean Engineering, continuous galvanizing line, including acid cleaning section and flux application tanks, equipped with a wet scrubber, and Ajax Magnothermic galvanizing kettle, equipped with a baghouse, and natural gas fired preheaters	OAC rule 3745-17-11(B)(1)	OAC rule 3745-17-08(B)(3)
	OAC rule 3745-17-07(A)(1)	
	40 CFR Part 63, Subpart CCC	
	OAC rule 3745-17-07(B)(1)	OAC rule 3745-31-02(A)(2)

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Applicable Emissions
Limitations/Control
Measures

Particulate emissions from the number 2 galvanizing line shall not exceed 46.8 pounds per hour. See A.I.2.e below.

Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Visible particulate emissions from the baghouse outlet shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

HCl emissions from the wet scrubber outlet from the number 2 galvanizing line shall not exceed 18 parts per million by volume (ppmv). See A.I.2.a through A.I.2.d below.

Visible fugitive particulate emissions from the number 2 galvanizing line shall not exceed twenty percent opacity as a 3-minute average from any

building openings.

The permittee shall employ reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust from the number 2 galvanizing line zinc coating pot. See A.I.2.f below.

HCl emissions from the wet scrubber outlet associated with this emissions unit (P906) shall not exceed 0.39 pound per hour.

HCl emissions from the wet scrubber outlet associated with this emissions unit (P906) and the wet scrubber outlets associated with emissions units P002 and P003 shall not exceed 3.00 tons per year, based upon a rolling, 12-month summation. See Sections A.II.4 and A.II.5 below.

See Part II, Section A, of these terms and conditions for facility-wide restrictions of hazardous air pollutants (HAPs).

2. Additional Terms and Conditions

- 2.a The permittee shall achieve initial compliance with the requirements of 40 CFR Part 63, Subpart CCC, no later than June 22, 2001, for the acid cleaning section of the number 2 galvanizing line.
- 2.b If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Ohio EPA Northeast District Office may be used.
- 2.c The permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem with the acid cleaning section of the number 2 galvanizing line and/or the wet scrubber and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of 40 CFR Part 63, Subpart CCC.
- 2.d The permittee shall maintain a record of each inspection of the acid cleaning section of the number 2 galvanizing line and the wet scrubber, including each item identified in Section A.III.3.iv, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.
- 2.e The particulate emissions limitation of 46.8 pounds per hour is based upon a process weight rate of 63 tons per hour and Table I of OAC rule 3745-17-11. If the emissions testing required for this emissions unit demonstrates that the allowable emissions rate from Figure II of OAC rule 3745-17-11 is more stringent than 46.8 lbs/hour, the permittee shall comply with the more stringent limitation.
- 2.f The permittee shall employ reasonably available control measures that include the use of fans, and ductwork to adequately enclose, contain, and capture the particulate emissions, and vent the captured emissions to the baghouse. The collection efficiency of such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.g The acid cleaning section and the flux application tanks of the galvanizing line shall be vented to a wet scrubber. The Ajax Magnothermic galvanizing kettle shall be vented to a baghouse.

II. Operational Restrictions

- 1. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 56 gallons per minute at all times while the emissions unit is in operation.

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2. The pressure drop across the baghouse shall be maintained within the range of 2 to 8 inches of water while the emissions unit is in operation. The pressure drop shall not be considered outside the normal range when the pressure drop falls below the minimum point in the pressure differential range as a result of bag replacements.

The permittee may petition the Northeast District Office for reestablishment of the pressure drop range at any time provided the permittee can demonstrate to the Northeast District Office that the operating conditions upon which the pressure drop range was previously established are not longer applicable.

3. As required by section 63.6(e)(3) of 40 CFR Part 63, Subpart A, the permittee shall develop and implement a written startup, shutdown, and malfunction plan for the acid cleaning section of the number 2 galvanizing line that describes, in detail, procedures for operating and maintaining the emissions unit during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the 40 CFR Part 63, Subpart CCC.
4. In order to comply with the annual HCl emission limitation of 3.00 tons per year from the wet scrubber outlet associated with this emissions unit (P906) and the wet scrubber outlets associated with emissions units P002 and P003, the annual cumulative HCl emissions shall not exceed 3.00 tons, based upon a rolling, 12-month summation. During the first twelve (12) calendar months of operation following the effective date of this permit, the cumulative number of tons of HCl emissions from emissions units P002, P003, and P906 shall not exceed the cumulative total number of tons of HCl emissions as specified for each month in the following table:

Month: Cumulative Number of Tons:

1	0.31
2	0.63
3	0.94
4	1.25
5	1.56
6	1.88
7	2.19
8	2.50
9	2.81
10	3.00
11	3.00
12	3.00

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5. In order to ensure compliance with the annual HCl emission limitation of 3.00 tons per year from the wet scrubber outlet associated with this emissions unit (P906) and the wet scrubber outlets associated with emissions units P002 and P003, the annual cumulative number of hours of operation of emissions units P002, P003, and P906 shall not exceed 15,392 hours, based upon a rolling, 12-month summation. During the first twelve (12) calendar months of operation following the effective date of this permit, the cumulative hours of operation of emissions units P002, P003, and P906 shall not exceed the cumulative total number of hours as specified for each month in the following table:

Month: Cumulative Number of Hours:

1	1603
2	3205
3	4808
4	6410
5	8013
6	9615
7	11218
8	12820
9	14423
10	15392
11	15392
12	15392

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the water flow rate across the wet scrubber while the emissions unit is in operation. The monitoring device and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The monitoring device used to monitor the water flow rate across the wet scrubber shall be certified to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.

The permittee shall collect and record the following information each shift while the wet scrubber is operating:

- the wet scrubber water flow rate, in gallons per minute; and
- the operating times, in hours (the time of day that operation begins and ends), for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

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2. The permittee shall maintain records for the acid cleaning section of the number 2 galvanizing line and the wet scrubber for 5 years from the date of each record of:
 - a. the occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - b. the occurrence and duration of each malfunction of the air pollution control equipment;
 - c. all maintenance performed on the air pollution control equipment;
 - d. actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
 - e. all information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan;
 - f. all required measurements needed to demonstrate compliance with 40 CFR Part 63, Subpart CCC, and to support the data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;
 - g. all results of initial or subsequent performance tests;
 - h. all documentation supporting initial notifications and notifications of compliance status; and
 - i. records of any applicability determination, including supporting analyses.
3. The permittee shall implement an operation and maintenance plan for each emission control device by not later than the compliance date of June 22, 2001, in accordance with 40 CFR Part 63, Subpart CCC. The plan must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

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- i. require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
 - ii. require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
 - iii. require cleaning of the scrubber internals at intervals sufficient to prevent buildup of solids or other fouling; and
 - iv. require an inspection of the scrubber at intervals of no less than 3 months with:
 - (a) cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
 - (b) repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
 - (c) repair or replacement of droplet eliminator elements as needed;
 - (d) repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
 - (e) adjustment of damper settings for consistency with the required air flow.
4. In addition to the general records required in section A.III.2 of these terms and conditions, the permittee shall maintain records for the acid cleaning section of the number 2 galvanizing line and the wet scrubber for 5 years from the date of each record of:
- a. scrubber makeup water flow rate and recirculation water flow rate;
 - b. calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and
 - c. each maintenance inspection and repair, replacement, or other corrective action.
5. The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Ohio EPA Northeast District Office for the life of the emissions unit or until the emissions unit is no longer subject to the provisions of 40 CFR Part 63, Subpart CCC. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Ohio EPA Northeast District Office for a period of 5 years after each revision to the plan.

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6. All records required by sections A.III.2 and A.III.4 of these terms and conditions for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.
7. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse associated with the zinc coating pot while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
8. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, conveyors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the wet scrubber water flow rate was not maintained at or above the required level.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse associated with the zinc coating pot was not within the allowable range specified above.
3. As required by section 63.10(d)(5)(i) of 40 CFR Part 63, Subpart A, the permittee shall submit the following reports:
 - a. If actions taken by the permittee during a startup, shutdown, or malfunction of the emissions unit (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 31st day following the end of each calendar half.
 - b. Any time an action taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of section 63.10(d)(5)(ii) of 40 CFR Part 63, Subpart A.
4. The permittee shall submit semiannual written reports which (a) identify all weeks during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, conveyors, etc.) serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
5. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month emissions of HCl from emissions units P002, P003, and P906 exceeded 3.00 tons per year, and the actual rolling, 12-month emissions of HCl for each such month.
6. The permittee shall submit deviation (excursion) reports which identify each month during which the rolling, 12-month number of hours of operation of emissions units P002, P003, and P906 exceeded 16,640 hours per year, and the actual rolling, 12-month number of hours of operation for each such month.

V. Testing Requirements

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

- a. Emission Limitation:

Particulate emissions from the number 2 galvanizing line shall not exceed 46.8 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

- b. Emission Limitation:

Visible particulate emissions from the wet scrubber outlet shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- c. Emission Limitation:

Visible particulate emissions from the baghouse outlet shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- d. Emission Limitation:

HCl emissions from the wet scrubber outlet from the number 2 galvanizing line shall not exceed 18 parts per million by volume (ppmv).

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the

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requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.

e. Emission Limitation:

Visible particulate emissions from the number 2 galvanizing line shall not exceed twenty percent opacity as a 3-minute average from any building openings.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

f. Emission Limitation:

HCl emissions from the wet scrubber outlet associated with this emissions unit (P906) shall not exceed 0.39 pound per hour.

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.

g. Emission Limitation:

HCl emissions from the wet scrubber outlet associated with this emissions unit (P906) and the wet scrubber outlets associated with emissions units P002 and P003 shall not exceed 3.00 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined by multiplying the number of hours of operation of this emissions unit (P906) and the number of hours of operation of emissions units P002 and P003 by an emission factor of 0.39 pound HCl per hour* and maintenance of a rolling, 12-month summation of HCl emissions for emissions units P002, P003, and P906, combined.

*The emission factor of 0.39 pound HCl per hour is based upon the results of

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stack testing conducted on January 25-26, 2006. The emission factor was obtained by calculating the average HCl emissions from three test runs for each of emission units P002, P003 and P906, and applying an upward adjustment to the highest of those average hourly HCl emissions (the highest average hourly HCl emissions was 0.36 pound HCl per hour obtained from emissions unit P003).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted every 2.5 years in accordance with 40 CFR Part 63, Subpart CCC.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for HCl.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 through 4 and 26A of 40 CFR Part 60, Appendix A.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA 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.

3. 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 Ohio EPA

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Northeast District Office 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 Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

None

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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>
P906 - Wean Engineering, continuous galvanizing line, including acid cleaning section and flux application tanks, equipped with a wet scrubber, and Ajax Magnothermic galvanizing kettle, equipped with a baghouse, and natural gas fired preheaters	None	None

2. Additional Terms and Conditions**2.a** None**II. Operational Restrictions**

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

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V. Testing Requirements

None

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VI. Miscellaneous Requirements

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None