



State of Ohio Environmental Protection Agency

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

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-13973

DATE: 6/5/2001

Olympic Mill Services
Keith Pyles
1014 West 9th Avenue
King of Prussia, PA 19406

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Very truly yours,

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

CC: USEPA
Brad Miller Hamilton County Dept. of
Environmental S

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 6/5/2001
Effective Date: 6/5/2001**

FINAL PERMIT TO INSTALL 02-13973

Application Number: 02-13973
APS Premise Number: 0278020754
Permit Fee: **\$1600**
Name of Facility: Olympic Mill Services
Person to Contact: Keith Pyles
Address: 1014 West 9th Avenue
King of Prussia, PA 19406

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2669 Martin Luther King Blvd
Youngstown, Ohio**

Description of proposed emissions unit(s):
Electric arc furnace slag processing facility.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. 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.

11. 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).

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

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

15. Fees

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

B. 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>
PE	21.23 tpy
PM-10	6.47 tpy

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
Unpaved roadways and parking areas	OAC rule 3745-31-05 (A)(3)	PE: 15.23 tons per year PM-10: 2.94 tons per year No visible particulate emissions except for 3 minutes during any 60-minute period.
	OAC rule 3745-17-08 (B), (B)(2)	Best available control measures that are sufficient to meet the visible emissions limitation (see Sections A.2.b through A.2.g) The requirements of these rules are less stringent than the limitation established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-17-07 (B)(5)	The visible emissions limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of A.1. are listed below:

unpaved roadways:

All

unpaved parking areas:

All

- 2.b** The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the applicable requirements of A.1. The permittee shall treat the unpaved roadways and parking areas with water and other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance with the applicable requirements of A.1. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.c** The frequency of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient to ensure compliance with the applicable requirements of A.1. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using water. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas specified in OAC rule 3745-17-07(B)(4).
- 2.e** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.f** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered if the control measure is necessary for the materials being transported. This requirement is not applicable to the transport of hot slag.

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Emissions Unit ID: F001

- 2.g** Implementation of the control measures specified in 2.b through 2.f in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08 and 3745-31-05.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of the unpaved roadways and parking areas in accordance with the following frequencies:

<u>unpaved roadways</u>	<u>minimum inspection frequency</u>
All	Daily

<u>unpaved parking areas</u>	<u>minimum inspection frequency</u>
All	Daily

- 2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures specified in A.2.b. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the applicable requirements of A.1. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- 3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the applicable requirements of A.1.
- 4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and

- d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in C.4.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the visible emissions limitation in A.1. for the unpaved roadways and parking areas shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.
2. Compliance with the annual mass emissions rate for PE and PM-10 shall be determined by using the equation(s) and methods in AP-42, Section 13.2.2, "Unpaved Roads", 09/98.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
Load-in, load-out, and wind erosion from unprocessed slag and product storage piles	OAC rule 3745-31-05 (A)(3)	PE: 0.31 tons per year PM-10: 0.15 tons per year
	OAC rule 3745-17-07 (B)(6)	No visible particulate emissions except for 1 minute in any 60-minute period.
	OAC rule 3745-17-08 (B), (B)(6)	Best available control measures that are sufficient to meet the visible emissions limitation (see Sections A.2.b, A.2.c and A.2.f) The visible emissions limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3). The requirements of these rules are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a The storage piles that are covered by this permit and subject to the requirements of A.1. are listed below:

All storage piles

- 2.b The permittee shall employ best available control measures on load-in and load-out

operations and wind erosion associated with the storage piles as needed for the purpose of ensuring compliance with the applicable requirements of A.1. The permittee shall treat all storage piles with sufficient water to ensure compliance with the applicable requirements of A.1. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c The control measure(s) specified in A.2.b shall be employed for load-in and load-out operations and wind erosion if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the applicable requirements of A.1. Any required implementation of the control measure(s) shall continue until further observation confirms that use of the measure(s) is unnecessary.
- 2.d Implementation of the control measures specified in A.2.b in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08 and 3745-31-05.

B. Operational Restrictions

- 1. During the first 12 months of operation after the issuance of this PTI, the permittee shall process no more than 10,833 tons of unprocessed EAF slag each month.
- 2. After the first 12 months of operation pursuant to this PTI, the permittee shall process no more than 130,000 tons of unprocessed slag through this emissions unit per rolling 12-month period .

C. Monitoring and/or Recordkeeping Requirements

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

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
All unprocessed storage piles daylight hours.	Visible emissions inspection twice per shift during

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

<u>storage pile identification</u>	<u>minimum load-out inspection frequency</u>
All unprocessed and processed storage piles	Visible emissions inspection twice per shift during

daylight hours.

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

storage pile identificationminimum wind erosion inspection frequency

All storage piles

Visible emissions inspection twice per shift during daylight hours.

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the applicable requirements of A.1. Any required inspection that is not performed due to any of these events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
5. The purpose of the inspections is to determine the need for implementing the control measures specified in A.2.b for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.
6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the applicable requirements of A.1.
7. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

8. The permittee shall record the following production data:
 - a. for the first 12 months of operation after the issuance of this PTI, the amount of unprocessed EAF slag processed each month; and
 - b. after the first 12 months of operation after the issuance of this PTI, the amount of unprocessed EAF slag processed each month and the rolling 12-month average.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation;
 - b. each instance when a control measure that was to be implemented as a result of an inspection was not implemented; and
 - c. each month when the amount of unprocessed EAF slag processed exceeded the operational restrictions in B.1. and B.2.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the visible emission limitations in A.1 for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.
2. Emissions Limitation:
PE: 0.31 tons per year.
PM-10: 0.15 tons per year.

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by the following method:

AP-42, 13.2.4.3, Equation 1 (01/95) shall be used for determining the appropriate emission factor

for use in calculating annual emissions for load-in and load-out at all storage piles (Note: The equation is adjusted for the expected control efficiency).

$$E = (k) (0.0032) ((u/5)^{1.3} / (m/2)^{1.4}) (1 - ce)$$

where;

E = emission factor for storage pile load-in/load-out emissions in lb/ton of material processed

k = 0.74, particle size multiplier for PM
0.35, particle size multiplier for PM-10

u = 10.01 mph, mean wind speed Cleveland, Ohio

m = 0.92%, unprocessed material moisture content
3.60%, processed material moisture content

ce = 90%, control efficiency for application of water and/or other dust suppressants as needed

Controlled emissions from load-in and load-out shall be calculated using the following emission factors derived from the above equation:

Storage Pile Type	Emission Factor (lb/ton)	
	PE	PM-10
Unprocessed EAF Slag and Scrap	0.001732	0.000819
Processed Slag	0.000256	0.000121
Processed Scrap	0.001732	0.000819

Note: Load-in emissions for processed slag and scrap are included in the EAF Slag Processing Plant emission calculations.

Controlled emissions from wind erosion shall be calculated based on the following equation:

$$EF = 1.7 (s / 1.5) [(365 - p) / 235] (f / 15)$$

where;

EF = emission factor for wind erosion from storage piles in lb/acre

s = 5.3, silt content of slag material

p = 150, mean number of days with ≥ 0.01 inch of precipitation

f = 30%, % of time the wind speed exceeds 12 mph

$$EF_{PM} = 2 \times EF_{PM-10}$$

Controlled emissions from wind erosion shall be calculated using the following emission factors derived from the above equation:

Storage Pile Type	Emission Factor (ton/acre)	
	PE	PM-10
Unprocessed EAF Slag and Scrap	1.0038	2.0057
Processed Slag	1.0038	2.0057
Processed Scrap	0.0	0.0

Compliance shall be determined by summing annual emissions for all storage piles, as follows:

$$E = E_{in} + E_{out} + E_{wind}$$

where;

E = annual emissions from load-in, load-out, and wind erosion for all storage piles

E_{in} = total annual emissions from load-in to unprocessed material storage piles

E_{out} = total annual emissions from load-out from all storage piles

E_{wind} = total annual emissions from wind erosion

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
EAF Slag Processing Plant material handling operations including conveyors, conveyor transfer points(including load-in to finished storage piles), and screens.	OAC rule 3745-31-05 (A)(3)	PE: 1.15 pounds per hour and 0.37 ton per year PM-10: 0.18 ton per year.
	OAC rule 3745-17-07 (B)(1)	Visible particulate emissions shall not exceed ten per cent opacity as a six-minute average. The visible emissions limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-17-08 (B)	The requirements of this rule are either equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a The material handling operation(s) that are covered by this permit and subject to the requirements of A.1. are listed below:
- i. conveyors and associated transfer points;
 - ii. conveyor drop points;
 - iii. Grizzlies; and
 - iv. screens.

- 2.b** The permittee shall employ best available control measures for material handling operation(s) for the purpose of ensuring compliance with the applicable requirements of A.1. The permittee shall implement the following control measure(s) to ensure compliance with the applicable requirements of A.1:

material handling operation(s)	control measure(s)
All conveyors and associated transfer points	Use of water sprays to sufficiently wet slag to meet the applicable requirements of A.1. throughout processing; Minimize drop height
All conveyor drop points	Use of water sprays to sufficiently wet slag to meet the applicable requirements of A.1. throughout processing; Minimize drop height
All screens	Use of water spray at each screen to meet applicable requirements of A.1.; Minimize drop height

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c** For each material handling operation that is not adequately enclosed, the control measure(s) specified in A.2.b. shall be implemented as needed to meet applicable requirements of A.1. during operation. If the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that additional control measure(s) is (are) necessary to ensure compliance with the applicable requirements of A.1., such additional control measures shall be implemented immediately. Any required implementation of the additional control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of these additional control measure(s) is unnecessary.
- 2.d** Specific additional control measures shall be determined by the permittee. Such additional control measures may include increased water application, use of chemical dust suppressant, or shut-down of operations. The use of additional control measures shall, at all times, comply with all air, surface water, ground water, solid waste, and hazardous waste laws and regulations.
- 2.e** Implementation of the control measure(s) specified in A.2.b in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of

Olympic Mill Services
PTI Application: 02-12072
Issued

Facility ID: 0278020754

Emissions Unit ID: F003

OAC rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

1. All transfer points and screens identified in A.2.b within the processing plant shall have an adequate water source available. In the case of failure or malfunction of any individual water spray, the failure or malfunction shall be reported as described in D.1.c and D.1.d.
2. In the event of failure or malfunction of a pump affecting more than one water spray location, the permittee shall evaluate visible emissions from such affected points upon discovery. Should observations indicate a potential or actual violation of visible emissions limitations, the permittee shall perform one or more of the following until normal control measures are restored:
 - a. utilize portable water sprays at the affected locations;
 - b. shut down the affected sources until repairs are made; and,
 - c. increase water flow to "upstream" conveyors to ensure that slag maintains sufficient moisture to prevent visible emissions violations from points of malfunctioning sprayers.
3. During the first 12 months of operation after the issuance of this PTI, the permittee shall process no more than 10,833 tons of unprocessed EAF slag each month.
4. After the first 12 months of operation pursuant to this PTI, the permittee shall process no more than 130,000 tons of unprocessed slag through this emissions unit per rolling 12-month period .

C. Monitoring and/or Recordkeeping Requirements

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

material handling operation(s)	minimum inspection frequency
All conveyors and associated transfer points	Monitoring twice per shift during daylight hours.
All conveyor drop points	Monitoring twice per shift during daylight hours.
All screens, and feeders	Monitoring twice per shift during daylight hours.

2. The inspections shall be performed during representative, normal operating conditions.

3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the applicable requirements of A.1.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined that a malfunction occurred in any individual water spray or pump servicing the slag processing plant (conveyors, transfer points, drop points, screens, feeder, and/or crushers);
 - c. the date of each inspection where it was determined by the permittee that it was necessary to implement additional control measure(s);
 - d. the dates that the additional control measure(s) was (were) implemented;
 - e. a description of the additional controls implemented; and,
 - f. on a calendar quarter basis, the total number of days additional control measure(s) was (were) implemented.

The information in paragraph 4.f shall be kept separately for each material handling operation and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee shall record the following production data:
 - a. for the first 12 months of operation after the issuance of this PTI, the amount of unprocessed EAF slag processed each month; and
 - b. after the first 12 months of operation after the issuance of this PTI, the amount of unprocessed EAF slag processed each month and the rolling 12-month average.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency; and,

- b. each instance when an additional control measure, that was to be performed as a result of an inspection, was not implemented; and,
 - c. each day that an inspection indicated a malfunction of any individual water spray or pump;
 - d. the dates that replacement or repair parts were ordered and installed for D.1.c; and
 - e. each month when the amount of unprocessed EAF slag processed exceeded the operational restrictions in B.3. and B.4.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the visible emission limitation of 10 per cent as a six-minute average for all material handling operations, and screens shall be determined in accordance with USEPA Method 9 as described in 40 CFR 60, Appendix A.

- a. Emissions Limitation:
PE: 1.15 pounds per year

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by the following method:

Conveyor transfer points = 1.01×10^{-4} lb PE/ton material processed,
as specified in AP-42 Table 11.19.2-2 (1/95);

Feeder loading = 0.001732 lb PE/ton material processed,
as derived from equation 1 of AP-42 Section 13.2.4;

Screening = 0.001764 lb PE/ton material processed,
as specified in AP-42 Table 11.19.2-2 (1/95);

These factors shall be used in the following equation:

$$H_{total} = H_t + H_f + H_s$$

where;

Htotal = total hourly emissions for all transfer points, feeder and screens

Ht = hourly PE emissions from transfer points, lbs/hr

Hf = hourly PE emissions for feeder loading, lbs/hr

Hs = hourly PE emissions for screens, lbs/hr

3. Emissions Limitation:
 PE: 0.37 ton per year
 PM-10: 0.18 ton per year.

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by the following method:

Conveyor transfer points = 1.01×10^{-4} lb PE/ton material processed and
 4.8×10^{-5} lb PM-10/ton material processed
 as specified in AP-42 Table 11.19.2-2 (1/95);

Feeder loading = 0.001732 lb PE/ton material processed and
 0.000819 lb PM-10/ton material processed,
 as derived from equation 1 of AP-42 Section 13.2.4;

Screening = 0.001764 lb PE/ton material processed
 0.00084 lb PM-10/ton material processed
 as specified in AP-42 Table 11.19.2-2 (1/95);

These factors shall be used in the following equation:

$$A_{total} = A_t + A_f + A_s$$

where;

A_{total} = total annual emissions for all transfer points, feeder and screens

A_t = annual PE/PM-10 emissions from transfer points, tons/yr

A_f = annual PE/PM-10 emissions for feeder loading, tons/yr

A_s = annual PE/PM-10 emissions for screens, tons /yr

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
EAF slag pot dump pit and associated material handling operations.	OAC rule 3745-31-05 (A)(3)	PE: 1.29 pounds per hour and 3.87 tons per year PM-10: 1.78 tons per year.
	OAC rule 3745-17-07 (B)(1)	Visible particulate emissions shall not exceed ten per cent opacity as a six-minute average. Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.b through A.2.e). The visible emissions limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-17-08 (B)	The requirements of this rule are either equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a The operations that are covered by this permit and subject to the requirements of A.1. are listed below:

- i. EAF slag pot dump pit;
- ii. Material handling operations within the pit (including excavation);

2.b The permittee shall employ best available control measures for the operations for the purpose of ensuring compliance with the applicable requirements of A.1. The permittee shall perform the following control measure to ensure compliance with the applicable requirements of A.1:

material handling operation(s)	control measure(s)
EAF slag dump pit	Use of water sprays to sufficiently wet slag to meet applicable requirements of A.1.as it is being dumped; Minimize drop height
Material handling operations within the pit (including excavation)	Use of water sprays to sufficiently wet slag to meet applicable requirements of A.1., throughout the handling process; Minimize drop height

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c For each operation that is not adequately enclosed, the control measure(s) specified in A.2.b shall be implemented as needed during operation. If the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that additional control measure(s) is (are) necessary to ensure compliance with the applicable requirements of A.1, such additional control measures shall be implemented immediately. Any required implementation of the additional control measure(s) shall continue during operation until further observation confirms that use of these additional control measure(s) is unnecessary.

2.d Specific additional control measures shall be determined by the permittee. Such additional control measures may include increased water application, use of chemical dust suppressant, or shut-down of operations. The use of additional control measures shall, at all times, comply with all air, surface water, ground water, solid waste, and hazardous waste laws and regulations.

2.e Implementation of the control measure(s) specified in A.2.b in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

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PTI A

Issued: 6/5/2001

Emissions Unit ID: **F004**

B. Operational Restrictions

1. All operations identified in A.2.b within the slag dumping pit shall have an available water source. In the case of failure or malfunction of any individual water spray, the failure or malfunction shall be reported as described in D.1.c and D.1.d.
2. In the event of failure or malfunction of a pump affecting more than one water spray location at or within the dump pit, the permittee shall evaluate visible emissions from such affected points upon discovery. Should observations indicate a potential or actual violation of visible emissions limitations, the permittee shall perform one or more of the following until normal control measures are restored:
 - a. Utilize portable water sprays at the affected locations;
 - b. Shut down the affected sources until repairs are made.
3. The permittee shall apply water, to molten slag upon completion of dumping into the pit. Sufficient water shall be applied to the slag as needed in order to eliminate visible emissions created by slag fuming.
4. The permittee shall not remove slag that has not been adequately wetted, as determined through Monitoring and Record keeping Requirements in paragraph C.1.
5. All fires caused by direct or indirect exposure to molten/hot slag shall be extinguished upon discovery.
6. No material other than EAF slag shall be dumped or otherwise handled in this emission unit. If any other materials are dumped/handled in this unit, the event shall be considered a malfunction and recorded/reported as described in C.5 and D.1.e .
7. No more than one EAF slag pot shall be dumped at a time.
8. During the first 12 months of operation after the issuance of this PTI, the permittee shall process no more than 10,833 tons of unprocessed EAF slag each month.
9. After the first 12 months of operation pursuant to this PTI, the permittee shall process no more than 130,000 tons of unprocessed slag through this emissions unit per rolling 12-month period .

C. Monitoring and/or Recordkeeping Requirements

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

material handling operation(s)	minimum inspection frequency
EAF slag dump pit	Monitoring twice per shift during daylight hours.
Material handling operations within the pit (including excavation)	Monitoring twice per shift during daylight hours.

2. The inspections shall be performed during representative, normal operating conditions.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the applicable requirements of A.1.
4. The permittee shall maintain records of the following information:
- the date and reason any required inspection was not performed;
 - the date of each inspection where it was determined that a malfunction occurred in any individual water spray or pump servicing the entire blast furnace slag dumping operation (including EAF dumping and EAF slag material handling);
 - the date of each inspection where it was determined by the permittee that it was necessary to implement additional control measure(s);
 - the dates that the additional control measure(s) was (were) implemented;
 - a description of the additional controls implemented; and
 - on a calendar quarter basis, the total number of days additional control measure(s) was (were) implemented

The information in C.4.f shall be kept separately for each of the two operations listed above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. In the event that any material other than EAF slag is dumped into this emission unit, OMS must

record the following information for each separate occurrence:

- a. type of material poured into the EAF slag pit;
 - b. quantity of material poured into the EAF slag pit;
 - c. date and time that the material was poured.
6. The permittee shall record the following production data:
- a. for the first 12 months of operation after the issuance of this PTI, the amount of unprocessed EAF slag processed each month; and
 - b. after the first 12 months of operation after the issuance of this PTI, the amount of unprocessed EAF slag processed each month and the rolling 12-month average.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency; and
 - b. each instance when an additional control measure, that was to be performed as a result of an inspection, was not implemented.
 - c. each day that an inspection indicated a malfunction of any individual water spray or pump.
 - d. the dates that replacement or repair parts were ordered and installed for D.1.c.
 - e. each instance when a material other than EAF slag was dumped in the emission unit, including all information recorded in C.5.
 - f. each month when the amount of unprocessed EAF slag processed exceeded the operational restrictions in B.8. and B.9.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the visible emission limitation of 10 per cent opacity as a six-minute average for all blast furnace slag dumping and material handling/excavating shall be determined in accordance with USEPA Method 9 as described in 40 CFR 60, Appendix A.

2. Emissions Limitation:
PE: 1.29 pounds per hour

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by the following method:

Molten EAF slag dumping = 0.057 lb PE/ton material processed (AP-42, Table 12.5-1; hot metal transfer (at source) emission factor = 0.19 lb PE/ton. The EAF slag dumping operation is estimated to emit 30%[#] of the PE estimated by the hot metal transfer emission factor).

Slag excavation = 0.001732 lb PE/ton material processed (equation 1 of AP-42 Section 13.2.4 and assuming 10% actual emissions).

These factors shall be used in the following equation:

$$H_{total} = H_d + H_e$$

where;

H_{total} = total hourly emissions for all EAF slag dumping pit activities

H_d and H_e shall be found individually through the following equations:

Molten blast furnace slag dumping

$$H_{dPE} = (0.19 \text{ lb PE/ton}) * (0.30^{\#}) * (T_a)$$

where;

H_{dPE} = hourly PE emissions from molten EAF slag dumping, lbs/hr

T_a = hourly throughput at EAF slag dump pit, lbs/hr

Slag excavation

$$\text{HePE} = \text{Ta} * [\text{k}^1 * 0.0032 * ((\text{u}/5)^{1.3})/((\text{m}/2)^{1.4})] * (1 - 0.9)$$

where;

He = hourly PE emissions for slag excavation (lbs /hr)

Ta = annual amount of slag excavated, tons/yr

k¹ = particle size multiplier for PE = 0.74 (AP-42, Page 13.2.4-3)

u = mean wind speed for Cleveland, Ohio (as supplied by permittee) = 10.01 mph

m = slag moisture content = 0.92% (AP-42, Table 13.2.4-1)

3. Emissions Limitation:
PE: 3.87 tons per year
PM-10: 1.78 tons per year.

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by the following method:

Molten EAF slag dumping = 0.057 lb PE/ton material processed (AP-42, Table 12.5-1; hot metal transfer (at source) emission factor = 0.19 lb PE/ton. The EAF slag dumping operation is estimated to emit 30%[#] of the PE estimated by the hot metal transfer emission factor).

= 0.0874 lb PM-10/ton material processed (AP-42, Table 12.5-2, 1/95 - approximately 46% of the mass PE emissions are PM-10 or smaller).

Slag excavation = 0.001732 lb PE/ton material processed (equation 1 of AP-42 Section 13.2.4 and assuming 10% actual emissions).

= 0.0874 lb PM-10/ton material processed (AP-42, Table 12.5-2, 1/95 - approximately 46% of the mass PE emissions are PM-10 or smaller).

These factors shall be used in the following equation:

$$\text{A}_{\text{total}} = \text{A}_{\text{d}} + \text{A}_{\text{e}}$$

where;

Atotal = total annual emissions for all EAF slag dumping pit activities

Ad and Ae shall be found individually through the following equations:

Molten blast furnace slag dumping

$$AdPE = (0.19 \text{ lb PE/ton}) * (0.30 \text{ \#}) * (Ta) / 2000$$

$$AdPM-10 = (0.19 \text{ lb PM-10/ton}) * (0.30) * (0.46) * Ta / 2000$$

where;

AdPE = annual PE emissions from molten EAF slag dumping, tons /yr

AdPM-10 = annual PM-10 emissions from molten EAF slag dumping, tons/yr

Ta = annual throughput at EAF slag dump pit, tons/yr

Slag excavation

$$AePE = Ta * [k^1 * 0.0032 * ((u/5)^{1.3})/((m/2)^{1.4})] * (1 - 0.9) / 2000$$

$$AePM-10 = Ta * [k * 0.0032 * ((u/5)^{1.3})/((m/2)^{1.4})] * (1 - 0.9) / 2000$$

where;

Ae = annual PE emissions for slag excavation, tons/yr

Ta = annual amount of slag excavated, tons/yr

k¹ = particle size multiplier for PE = 0.74 (AP-42, Page 13.2.4-3)

k - particle size multiplier for PM-10 = 0.35 (AP-42, Page 13.2.4-3)

u = mean wind speed for Cleveland, Ohio (as supplied by permittee) = 10.01 mph

m = slag moisture content = 0.92% (AP-42, Table 13.2.4-1)

the permittee may submit data and information in support of the use of another emissions factor to be reviewed and approved by Ohio EPA.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. 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>
Oxygen Lance cutting operations	OAC rule 3745-31-05 (A)(3)	PE: 2.80 pounds per hour and 1.40 tons per year. PM-10: 1.40 tons per year. Best available control measures that are sufficient to meet the applicable requirements (see Sections A.2.b through A.2.e).
	OAC rule 3745-17-07 (B)(1)	Visible particulate emissions shall not exceed twenty per cent opacity as a three-minute average.
	OAC rule 3745-17-08 (B)	The requirements of this rule are either equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
Oxygen Lance material handling operations	OAC rule 3745-31-05 (A)(3)	Visible particulate emissions shall not exceed ten per cent opacity as a six-minute average. Best available control measures that are sufficient to meet the applicable requirements (see Sections A.2.b through A.2.e)

OAC rule 3745-17-07 (B)(1)

The visible emissions limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

OAC rule 3745-17-08 (B)

The requirements of this rule are either equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

2.a The operations that are covered by this permit and subject to the requirements of A.1. are listed below:

- i. Oxygen lancing station; and
- ii. Oxygen lancing material handling operations.

2.b The permittee shall employ best available control measures for the purpose of ensuring compliance with the applicable requirements of A.1. The permittee shall perform the following control measures or equivalent control to ensure compliance with the applicable requirements of A.1:

operation(s)	control measure(s)
Oxygen lancing operations	Use of CO2 suppression to meet the applicable requirements during lancing operations.
Oxygen lancing material handling operations	Use of water sprays during material handling operations to meet the applicable requirements; Minimize drop height

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c For each operation that is not adequately enclosed, the control measures specified in A.2.b. shall be implemented during operation. If the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that additional control measures are necessary to ensure compliance with the applicable requirements of

A.1, such additional control measures shall be implemented immediately, as needed. Any required implementation of the additional control measures shall continue during operation until further observation confirms that use of these additional control measures is unnecessary.

- 2.d** Specific additional control measures shall be determined by the permittee. Such additional control measures for oxygen lancing operations may include increased CO₂ flow, use of portable baghouse units, or shut-down of operations. Such additional control measures for material handling operations may include increased water application, use of chemical dust suppressant, or shutdown of operations. The use of additional control measures shall, at all times, comply with all air, surface water, ground water, solid waste, and hazardous waste laws and regulations.
- 2.e** Implementation of the control measure(s) specified in A.2.b in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

1. The permittee shall utilize the CO₂ suppression system during operation of this emissions unit in accordance with manufacturer's recommendations during all lancing activities. CO₂ shall be delivered through the lance at sufficient pressure and flow rate to meet the applicable requirement of A.1.
2. In the event that the permittee fails to utilize or incorrectly utilizes CO₂ suppression during oxygen lancing operations, visible emissions shall be evaluated from such affected points upon discovery. Should observations indicate a potential or actual violation of visible emissions limitations, one or more of the following shall be performed until normal control measures are restored:
 - a. immediately establish CO₂ flow at correct rate and pressure from permanent or portable tanks;
 - b. utilize portable baghouse unit(s) to achieve a control efficiency equivalent to that of CO₂ suppression; or
 - c. shut down the affected sources until repairs/corrections are made.
3. All oxygen and carbon dioxide tanks associated with the lancing operations shall be equipped with the following gauges:

- a. pressure gauge; and
 - b. gauge capable of displaying the volume or weight of gas or liquid present in tank.
4. Lancing operations shall not be performed if CO₂ pressure falls below the manufacturer's recommended pressure or if it is otherwise determined that the CO₂ tank(s) do not contain sufficient CO₂ to supply the lancing operations for the duration of the activity.
 5. The permittee shall apply an adequate amount of water to the cutting area as needed to meet the applicable requirements of A.1. Material handling operations shall not be conducted with hot material or material that has not been adequately wetted, as determined through Monitoring and Record keeping Requirements C.1, below.
 6. Should observations indicate a potential or actual violation of visible emissions limitations, one or more of the following shall be performed until normal control measures are restored:
 - a. immediately apply adequate water or other suitable dust suppressant to the cutting area;
 - b. shut down the affected sources until repairs/corrections are made.
 7. The permittee shall install and maintain a gauge capable of displaying CO₂ gas pressure on the outlet side of the oxygen/CO₂ manifold, between the manifold and the oxygen lance, and on the outlet side of all valves prior to the nozzle.
 8. During the first 12 months of operation after the issuance of this PTI, the permittee shall process no more than 833 tons of scrap through this emissions unit each month.
 9. After the first 12 months of operation pursuant to this PTI, the permittee shall process no more than 10,000 tons of scrap through this emissions unit per rolling 12-month period .

C. Monitoring and/or Recordkeeping Requirements

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

operation(s)	minimum inspection frequency
All lancing operations	Monitor of visible emissions twice per shift during daylight hours.

Material handling operations

Inspect for adequate cooling and moisture content prior to commencing any material handling operations; Monitoring of visible emissions twice per shift during daylight hours.

The inspections shall be performed during representative, normal operating conditions.

2. The permittee may, upon receipt of written approval from the appropriate Ohio EPA district office or local air agency, modify the inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the applicable requirements of A.1.
3. The permittee shall perform daily inspections of all lancing equipment prior to beginning any lancing operations. Operators shall, at a minimum, inspect the following:
 - a. carbon dioxide and oxygen tank pressure gauges for proper operation and adequate tank pressure;
 - b. carbon dioxide and oxygen tank weight/volume gauges for proper operation and adequate gas supply;
 - c. all hoses and lines for cracks, leaks or other damage;
 - d. all couplings and fittings for cracks, leaks, or other damage; and
 - e. all valves for proper operation and flow.
4. The permittee shall maintain records of the following information for oxygen lancing and associated material handling operations:
 - a. the date and reason any inspection as required in C.1 was not performed;
 - b. the date of each inspection where it was determined that visible emissions indicated a malfunction of oxygen lancing and/or material handling control measures;
 - c. the date of each inspection where it was determined by the permittee that it was necessary to implement additional control measure(s) for either operation;
 - d. the dates that the additional control measure(s) was (were) implemented;

- e. a description of the additional controls implemented; and
- f. on a calendar quarter basis, the total number of days that additional control measure(s) was (were) implemented;

The information shall be kept for lancing and associated material handling operations.

- 5. The permittee shall maintain the following daily records for the oxygen lancing operation:
 - a. the date that any inspection as required in C.3 revealed damaged or incorrectly operating equipment or gauges, inadequate tank pressure, or inadequate gas supply;
 - b. actions taken to correct the problem;
 - c. the date that equipment or replacement parts (if needed) for repairs were ordered; and
 - d. the date that equipment or replacement parts (if needed) were installed.

6. The permittee shall record the following production data:
 - a. for the first 12 months of operation after the issuance of this PTI, the amount of scrap processed each month; and
 - b. after the first 12 months of operation after the issuance of this PTI, the amount of scrap processed each month and the rolling 12-month average.
7. The permittee shall maintain the following daily records on each day this emissions unit is in operation:
 - a. the number of hours the emissions unit was in operation; and
 - b. the amount of carbon dioxide.
8. The permittee shall observe the pressure gauge on the outlet side of the manifold, as required in B.7, to verify that the CO₂ is available for fume suppression at the outlet of the oxygen lance.
9. The permittee shall record the pressure gauge reading, as required in B.7, in a log book prior to or immediately following commencement of lancing operations for each shift.

D. Reporting Requirements

1. The permittee shall submit deviation reports that detail any of the following occurrences:
 - a. each day during which any inspection required by this permit was not performed by the required frequency and an explanation;
 - b. each instance when an additional control measure, that was to be implemented as a result of an inspection, was not implemented and an explanation;
 - c. each day that an inspection indicated malfunction of or damage to any control measure or equipment (including inadequate CO₂ supply). The permittee shall also include a detailed description of the problem(s), reason(s) for the malfunction, and a description of corrective actions taken;
 - d. each month when the amount of scrap processed exceeded the operational restrictions in B.8. and B.9.
 - e. each day during which the lancing operation occurred without CO₂ suppression or

without gauges; and

- f. each day that an inspection indicated a malfunction of any individual gauge or if the pressure drops below that recommended by the manufacturer.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the visible emission limitation of 20 per cent opacity as a three-minute average for oxygen lancing operations shall be determined in accordance with USEPA Method 9 as described in 40 CFR 60, Appendix A.
2. Compliance with the visible emission limitation of 10 per cent opacity as a six-minute average for oxygen lancing material handling operations shall be determined in accordance with USEPA Method 9 as described in 40 CFR 60, Appendix A.
3. Emissions Limitation:
PE: 2.80 pounds per hour

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by the following method:

Oxygen lancing: An uncontrolled emission factor of 2.8 lb PE/ton metal lanced shall be used. CO₂ suppression reduces emissions by 90%. Therefore, the controlled emission factor is 0.28 lb PE/ton metal lanced.

$$H = (0.28) (Wh)$$

where;

H = hourly PE emissions, lbs/hr

Wh = hourly throughput, tons/hr

4. Emissions Limitation:
PE: 1.40 tons per year
PM-10: 1.40 tons per year

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by the following method:
Oxygen lancing: An uncontrolled emission factor of 2.8 lb PE and PM-10/ton metal lanced shall be used. CO2 suppression reduces emissions by 90%. Therefore, the controlled emission factor is 0.28 lb PE and PM-10/ton metal lanced.

$$A = (0.28) (W_a) / 2000$$

where;

A = annual PE and PM-10 emissions, tons/yr

W_a = annual throughput, tons/yr

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
EAF slag ball drop operations with a single crane/drop ball and associated material handling.	OAC rule 3745-31-05 (A)(3)	PE: 0.03 pound per hour and 0.03 ton per year PM-10: 0.02 ton per year. Visible particulate emissions shall not exceed ten per cent opacity as a six-minute average. Best available control measures that are sufficient to meet the applicable requirements (see Sections A.2.b through A.2.e)
	OAC rule 3745-17-07 (B)(1)	The visible emissions limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-17-08 (B)	The requirements of this rule are either equivalent to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a The operations that are covered by this permit and subject to the applicable requirements of A.1. are listed below:
 - i. EAF slag drop balling operations;

ii. Material handling operations within the pit (including excavation).

- 2.b** The permittee shall employ best available control measures for the purpose of ensuring compliance with the applicable requirements of A.1. The permittee shall perform the following control measure as needed to ensure compliance with the visible emissions limitation in paragraph A.1:

operation(s)	control measure(s)
EAF slag drop balling operations	Use of water spray(s) during the drop balling operation to meet applicable requirements.
Material handling operations within the pit (including excavation)	Use of water sprays to wet slag during the handling process to meet applicable requirements; Minimize drop height

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c** For each operation that is not adequately enclosed, the control measure(s) shall be implemented during operation. If the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that additional control measure(s) is (are) necessary to ensure compliance with the applicable requirements of A.1, such additional control measures shall be implemented immediately. Any required implementation of the additional control measure(s) shall continue during operation until further observation confirms that use of these additional control measure(s) is unnecessary.
- 2.d** Specific additional control measures shall be determined by the permittee. Such additional control measures may include increased water application, use of chemical dust suppressant, or shut-down of operations. The use of additional control measures shall, at all times, comply with all air, surface water, ground water, solid waste, and hazardous waste laws and regulations.
- 2.e** Implementation of the control measure(s) specified in A.2.b in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

B. Operational Restrictions

1. All operations identified in C 2.b associated with the slag drop balling pit shall have water sprays available. In the case of failure or malfunction of any individual water spray during use of the pit or any material handling operations associated with the pit, the failure or malfunction shall be reported as described in D.1.c and D.1.d.
2. In the event of failure or malfunction of a pump affecting any water delivery location at or within the balling pit, the permittee shall evaluate visible emissions from such affected points upon discovery. Should observations indicate a potential or actual violation of visible emissions limitations, the permittee shall perform one or more of the following until normal control measures are restored:
 - a. utilize portable water sprays at the affected locations;
 - b. shut down the affected sources until repairs are made.
3. The permittee shall apply water to slag placed within the pit prior to commencing drop balling operations or material handling operations in order to ensure that the material has cooled enough to maintain adequate moisture content. Drop balling or material handling operations shall not be conducted with hot slag or slag that has not been adequately wetted, as determined through Monitoring and Record keeping Requirements in C.1.
4. During the first 12 months of operation after the issuance of this PTI, the permittee shall process no more than 1,500 tons of slag through this emissions unit each month.
5. After the first 12 months of operation pursuant to this PTI, the permittee shall process no more than 18,000 tons of slag through this emissions unit per rolling 12-month period .

C. Monitoring and/or Recordkeeping Requirements

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

operation(s)	minimum inspection frequency
EAF slag drop ball pit	Inspect slag for adequate cooling and moisture content prior to commencing any drop-balling operation; Monitoring of visible emissions twice per shift during daylight hours.

Material handling operations within the pit (including excavation)	Inspect slag for adequate cooling and moisture content prior to commencing any material handling operations; Monitoring of visible emissions twice per shift during daylight hours.
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2. The inspections shall be performed during representative, normal operating conditions.

3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the applicable requirements of A.1.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined that a malfunction occurred in any individual water spray or pump servicing the entire EAF slag drop ball pit and/or associated material handling operations;
 - c. the date of each inspection where it was determined by the permittee that it was necessary to implement additional control measure(s);
 - d. the dates that the additional control measure(s) was (were) implemented;
 - e. a description of the additional controls implemented; and
 - f. on a calendar quarter basis, the total number of days additional control measure(s) was (were) implemented.

The information in C.4.f shall be kept separately for each of the two operations and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

5. The permittee shall record the following production data:
 - a. for the first 12 months of operation after the issuance of this PTI, the amount of slag processed each month; and
 - b. after the first 12 months of operation after the issuance of this PTI, the amount of slag processed each month and the rolling 12-month average.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency;

- b. each instance when an additional control measure, that was to be performed as a result of an inspection, was not implemented;
 - c. each day that an inspection indicated a malfunction of any individual water spray or pump;
 - d. the dates that replacement or repair parts were ordered and installed for D.1.c; and
 - e. each month when the amount of slag processed exceeded the operational restrictions in B.4. and B.5.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the visible emission limitation of 10 per cent opacity as a six-minute average for all EAF slag drop balling and associated material handling shall be determined in accordance with USEPA Method 9 as described in 40 CFR 60, Appendix A.
2. Emissions Limitation:
PE: 0.03 pound per year

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by the following method:

EAF slag drop balling = AP-42 (table 11.19.2-2, 1/95), Tertiary crushing, the controlled emission factor is 0.00059 lb PM-10/ton material processed. This factor is multiplied by 2.1 for total PE (0.001239).

Material handling: truck loading: AP-42 (table 11.19.2-2, 1/95), Truck loading—conveyor: crushed stone, emission factor is 0.00010 lb PM-10/ton material processed. This factor is multiplied by 2.1 for total PE (0.00021).

Material handling: material removal: Emissions from material removal is assumed to be approximately 50% of the storage pile equation (AP-42, 13.2.4.3, equation 1), as follows:

$$EF = k (0.0032) ((u/5)^{1.3}) / ((m/2)^{1.4})$$

k = 0.74, particle size multiplier for PE

$u = 10.01$ mph, mean wind speed Cleveland, Ohio

$m = 0.92\%$, unprocessed material moisture content

$$EF_{PE} = (0.002368) (2.46549) / (0.33718)$$

$$EF_{PE} = 0.017315 \text{ lb PE/ton}$$

$$EF_{PE} = (0.017315 \text{ lb PE/ton}) (50\%) = 0.0086575 \text{ lb PE/ton material}$$

These factors shall be used in the following equation (assuming 40% control for water):

$$H_{total} = H_d + (H_t + H_r) (1 - 0.40)$$

where;

H_{total} = total hourly emissions for all drop ball pit activities

H_d , H_t and H_r shall be found individually through the following equations:

EAF drop balling

$$H_dPE = (H_{eaf}) (0.001239 \text{ lb PE/ton})$$

where;

H_dPE = hourly PE emissions from EAF drop-balling, lbs/hr

H_{eaf} = hourly throughput at EAF drop balling station, tons/hr

Truck loading

$$H_tPE = (H_{eaf}) (0.00021 \text{ lb PE/ton})$$

where;

H_tPE = hourly PE emissions from EAF truck loading, lbs/hr

H_{eaf} = hourly throughput at EAF drop balling station, tons/hr

Material removal

$$\text{HrPE} = (\text{Heaf}) (0.0086575 \text{ lb PE/ton})$$

where;

HrPE = hourly PE emissions from material removal, lbs/hr

Heaf = hourly throughput at EAF drop balling station, tons/hr

3. Emissions Limitation:
 PE: 0.03 ton per year
 PM-10: 0.02 ton per year

Applicable Compliance Method:

Compliance with the particulate emissions limitation shall be determined by the following method:

EAF slag drop balling = AP-42 (table 11.19.2-2, 1/95), Tertiary crushing, the controlled emission factor is 0.00059 lb PM-10/ton material processed. This factor is multiplied by 2.1 for total PE (0.001239).

Material handling: truck loading: AP-42 (table 11.19.2-2, 1/95), Truck loading—conveyor: crushed stone, emission factor is 0.00010 lb PM-10/ton material processed. This factor is multiplied by 2.1 for total PE (0.00021).

Material handling: material removal: Emissions from material removal is assumed to be approximately 50% of the storage pile equation (AP-42, 13.2.4.3, equation 1), as follows:

$$EF = k (0.0032) ((u/5)^{1.3}) / ((m/2)^{1.4})$$

$$k = 0.74, \text{ particle size multiplier for PE} \\ 0.35, \text{ particle size multiplier for PM-10}$$

$$u = 10.01 \text{ mph, mean wind speed Cleveland, Ohio}$$

$$m = 0.92\%, \text{ unprocessed material moisture content}$$

$$EF_{PE} = (0.002368) (2.46549) / (0.33718)$$

$$EF_{PE} = 0.017315 \text{ lb PE/ton}$$

$$EF_{PE} = (0.017315 \text{ lb PE/ton}) (50\%) = 0.0086575 \text{ lb PE/ton material}$$

$$EF_{PM-10} = (0.00112) (2.46549) / (0.33718)$$

$$EF_{PM-10} = 0.00819 \text{ lb PM-10/ton}$$

$$EF_{PM-10} = (0.00819 \text{ lb PM-10/ton}) (50\%) = 0.00409 \text{ lb PM-10/ton material}$$

These factors shall be used in the following equation (assuming 40% control for water):

$$A_{total} = A_d + (A_t + A_r) (1 - 0.40)$$

where;

A_{total} = total annual emissions for all drop ball pit activities

A_d , A_t and A_r shall be found individually through the following equations:

EAF drop balling

$$\text{AdPE} = (\text{Aeaf}) (0.001239 \text{ lb PE/ton}) / (2000 \text{ lb/ton})$$

$$\text{AdPM-10} = (\text{Aeaf}) (0.00059 \text{ lb PM-10/ton}) / (2000 \text{ lb/ton})$$

where;

AdPE = annual PE emissions from EAF drop-balling, tons/yr

AdPM-10 = annual PM-10 emissions from EAF drop-balling, tons/yr

Aeaf = annual throughput at EAF drop balling station, tons/yr

Truck loading

$$\text{AtPE} = (\text{Aeaf}) (0.00021 \text{ lb PE/ton}) / (2000 \text{ lb/ton})$$

$$\text{AtPM-10} = (\text{Aeaf}) (0.00010 \text{ lb PM-10/ton}) / (2000 \text{ lb/ton})$$

where;

AtPE = annual PE emissions from EAF truck loading, tons/yr

AtPM-10 = annual PM-10 emissions from EAF truck loading, tons/yr

Aeaf = annual throughput at EAF drop balling station, tons/yr

Material removal

$$\text{ArPE} = (\text{Aeaf}) (0.0086575 \text{ lb PE/ton}) / (2000 \text{ lb/ton})$$

$$\text{ArPM-10} = (\text{Aeaf}) (0.00409 \text{ lb PM-10/ton}) / (2000 \text{ lb/ton})$$

where;

ArPE = annual PE emissions from material removal, tons/yr

ArPM-10 = annual PM-10 emissions from material removal, tons/yr

Aeaf = annual throughput at EAF drop balling station, tons/yr

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 02-13973 Facility ID: 0278020754

FACILITY NAME Olympic Mill Services

FACILITY DESCRIPTION Slag processing facility

CITY/TWP Youngstown

Emissions Unit ID: F006

SIC CODE 3399 SCC CODE 3-03-009-24 EMISSIONS UNIT ID F001

EMISSIONS UNIT DESCRIPTION Unpaved roadways and parking areas

DATE INSTALLED 4/00

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				15.23 tpy
PM ₁₀					2.94 tpy
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES: N/A

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination: Application of water and any other suitable dust suppression chemicals. The use of best available control measures to eliminate or minimize visible emissions of fugitive dust.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? N/A

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 02-13973 Facility ID: 0278020754

FACILITY NAME Olympic Mill Services

FACILITY DESCRIPTION Slag processing facility CITY/TWP Youngstown

Emissions Unit ID: F006

SIC CODE 3399 SCC CODE 3-03-099-24 EMISSIONS UNIT ID F002

EMISSIONS UNIT DESCRIPTION Unprocessed slag and product storage piles

DATE INSTALLED 4/00

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				0.31 tpy
PM ₁₀					0.15 tpy
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES: N/A

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination: Application of water and any other suitable dust suppression chemicals. Maintaining low pile heights and minimizing material drop heights. The use of best available control measures to eliminate or minimize visible emissions of fugitive dust.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? N/A

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 02-13973 Facility ID: 0278020754

FACILITY NAME Olympic Mill Services

FACILITY DESCRIPTION Slag processing facility

CITY/TWP Youngstown

Emissions Unit ID: F006

SIC CODE 3399 SCC CODE 3-03-009-24 EMISSIONS UNIT ID F003

EMISSIONS UNIT DESCRIPTION EAF Slag Processing Plant material handling operations including conveyors, conveyor transfer points, crushers, and screens

DATE INSTALLED 4/00

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment			1.15	0.37 tpy
PM ₁₀					0.18 tpy
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES: N/A

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination: Application of water and any other suitable dust suppression chemicals. Mminimizing material drop heights. The use of best available control measures to eliminate or minimize visible emissions of fugitive dust.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? N/A

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 02-13973 Facility ID: 0278020754

FACILITY NAME Olympic Mill Services

FACILITY DESCRIPTION Slag processing facility

CITY/TWP Youngstown

Emissions Unit ID: F006

SIC CODE 3399 SCC CODE 3-03-009-24 EMISSIONS UNIT ID F004

EMISSIONS UNIT DESCRIPTION EAF slag pot dump pit and associated material handling operations

DATE INSTALLED 4/00

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment			0.1.29	3.87 tpy
PM ₁₀					1.78 tpy
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES: N/A

NSPS? NESHAP? PSD? OFFSET POLICY?

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

Enter Determination: Application of water and any other suitable dust suppression chemicals. Maintaining low pile heights and minimizing material drop heights. The use of best available control measures to eliminate or minimize visible emissions of fugitive dust.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? N/A

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SC

PTI Num

FACILITY

Emissions Unit ID: **F006** _____

FACILITY DESCRIPTION Slag processing facility CITY/TWP Youngstown

SIC CODE 3399 SCC CODE 3-03-009-24 EMISSIONS UNIT ID F005

EMISSIONS UNIT DESCRIPTION Oxygen lance cutting operations

DATE INSTALLED 4/00

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment			2.8	1.4 tpy
PM ₁₀					1.4 tpy
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES: N/A

NPSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

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

Enter Determination: The use of best available control measures to eliminate or minimize visible emissions of fugitive dust.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? N/A

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 02-13973 Facility ID: 0278020754

FACILITY NAME Olympic Mill Services

FACILITY DESCRIPTION Slag processing facility CITY/TWP Youngstown

Emissions Unit ID: **F006**

SIC CODE 3399 SCC CODE 3-03-009-24 EMISSIONS UNIT ID F006

EMISSIONS UNIT DESCRIPTION EAF slag ball drop with a single crane /drop ball operation and associated material handling

DATE INSTALLED 4/00

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment			0.03	0.03 tpy
PM ₁₀					0.02 tpy
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES: N/A

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

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

Enter Determination: Application of water and any other suitable dust suppression chemicals. Maintaining low pile heights and minimizing material drop heights. The use of best available control measures to eliminate or minimize visible emissions of fugitive dust.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? N/A

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____