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: 02-18955

DATE: 2/12/2004

Olympic Mill Services
Jim Shewell
300 Conshohocken State Road
West Conshohocken, PA 19428

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA **NEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 2/12/2004**
Terms and Conditions	**Effective Date: 2/12/2004**

FINAL PERMIT TO INSTALL 02-18955

Application Number:	02-18955
APS Premise Number:	0278020754
Permit Fee:	**$200**
Name of Facility:	Olympic Mill Services
Person to Contact:	Jim Shewell
Address:	300 Conshohocken State Road West Conshohocken, PA 19428

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

Description of proposed emissions unit(s):
Diesel generator.

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

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping 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 record keeping 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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

Pollutant	Tons Per Year
NO_x	24.75
CO	4.72
SO_x	1.27
PE	0.39
OC	0.51

Emissions Unit ID: **P001**

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	Applicable Rules/Requirements
P001 - 425 HP Cummins diesel generator, Model NTA855-G4	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-11(B)(5)(a)
	OAC rule 3745-18-06(G)
	OAC rule 3745-21-07(B)
	OAC rule 3745-21-08(B)
	OAC rule 3745-23-06(B)

Applicable Emissions Limitations/Control Measures	
	average, except as specified by rule.
Particulate emissions (PE) shall not exceed 0.17 lb/hr and 0.39 TPY.	The PE limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
Sulfur dioxide (SO_2) emissions shall not exceed 0.55 lb/hr and 1.27 TPY.	See Section A.2.c.
Nitrogen oxide (NO_x) emissions shall not exceed 10.76 lbs/hr and 24.75 TPY.	See Section A.2.b.
Carbon monoxide (CO) emissions shall not exceed 2.05 lbs/hr and 4.72 TPY.	See Section A.2.b.
Organic compound (OC) emissions shall not exceed 0.22 lb/hr and 0.51 TPY.	See Section A.2.b.
See Section B.1. below.	
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).	
Hours of operation shall be limited to 4,600 hours as a 12-month rolling summation.	
See Sections A.2a, B.2. and B.3. below.	
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute	

2. Additional Terms and Conditions

2.a The permittee chose to voluntarily restrict the hours of operation to a 12-month rolling summation in order to avoid modeling sulfur dioxide under the Ohio Air Toxics Policy.

2.b The permittee has satisfied the "best available control techniques and operating practices" for this emissions unit, as required pursuant to OAC rule 3745-21-07(B) and the "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-07(B) and 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit-to-install (PTI).

2.c This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).

B. Operational Restrictions

1. The permittee shall use only diesel fuel (number 2 fuel oil) with a maximum sulfur content of 0.5 percent by weight for combustion in this emissions unit.

2. During the first 12 months of operation after the issuance of this PTI, the emissions unit shall not operate more than 383.3 hours each month.

3. After the first 12 months of operation pursuant to this PTI, the emissions unit shall not operate more than 4600 hours per 12-month rolling period.

C. Monitoring and/or Record keeping Requirements

1. For each day during which the permittee burns a fuel other than diesel fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit. The permittee shall also maintain documentation of the sulfur content of all fuels received.

2. The permittee shall record the following data each month:

a. For the first 12 months of operation after the issuance of this PTI, the hours of operation each month; and

b. After the first 12 months of operation after the issuance of this PTI, the hours of operation each month and the 12-month rolling summation.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day during which a fuel other than diesel fuel was burned in this emissions unit, and also each record identifying an exceedance of 0.5% sulfur content, by weight.

2. The permittee shall submit deviation (excursion) reports that identify each month during which the hours of operation exceeded the operational restrictions in Sections B.2. and B.3.

3. The deviation (excursion) reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

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

a. Emission Limitation:
PE shall not exceed 0.17 lb/hr and 0.39 TPY.

Applicable Compliance Method:
The emission limitations were based upon emission factors supplied by the equipment manufacturer. Compliance with the hourly emission limitation shall be determined by multiplying the 0.0004 lb/hp-hr emission factor by the 425 hp rating of the unit. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 4600 hrs/yr and dividing by 2000 lbs/ton.

b. Emission Limitation:
SO_2 emissions shall not exceed 0.55 lb/hr and 1.27 TPY.

Applicable Compliance Method:
The emission limitations were based upon emission factors supplied by the equipment manufacturer. Compliance with the hourly emission limitation shall be determined by multiplying the 0.0013 lb/hp-hr emission factor by the 425 hp rating of the unit. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 4600 hrs/yr and dividing by 2000 lbs/ton.

c. Emission Limitation:
NO_x emissions shall not exceed 10.76 lbs/hr and 24.75 TPY.

Applicable Compliance Method:

The emission limitations were based upon emission factors supplied by the equipment manufacturer. Compliance with the hourly emission limitation shall be determined by multiplying the 0.0253 lb/hp-hr emission factor by the 425 hp rating of the unit. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 4600 hrs/yr and dividing by 2000 lbs/ton.

d. Emission Limitation:
CO emissions shall not exceed 2.05 lbs/hr and 4.72 TPY.

Applicable Compliance Method:
The emission limitations were based upon emission factors supplied by the equipment manufacturer. Compliance with the hourly emission limitation shall be determined by multiplying the 0.0048 lb/hp-hr emission factor by the 425 hp rating of the unit. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 4600 hrs/yr and dividing by 2000 lbs/ton.

e. Emission Limitation:
OC emissions shall not exceed 0.22 lb/hr and 0.51 TPY.

Applicable Compliance Method:
The emission limitations were based upon emission factors supplied by the equipment manufacturer. Compliance with the hourly emission limitation shall be determined by multiplying the 0.00051 lb/hp-hr emission factor by the 425 hp rating of the unit. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 4600 hrs/yr and dividing by 2000 lbs/ton.

f. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:
Compliance with the above visible emission limitation shall be determined by USEPA's Reference Method 9 in 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 02-18955 Facility ID: 0278020754

FACILITY NAME Olympic Mill Services

FACILITY DESCRIPTION Diesel generator CITY/TWP Youngstown

SIC CODE 3295 SCC CODE 2-03-001-01 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION 425 HP diesel generator

DATE INSTALLED upon PTI issuance

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	0.17 lb/hr	0.27	0.17 lb/hr	0.39
PM_{10}					
Sulfur Dioxide	Attainment	0.55 lb/hr	0.86	0.55 lb/hr	1.27
Organic Compounds	Attainment	0.22 lb/hr	0.34	0.22 lb/hr	0.51
Nitrogen Oxides	Attainment	10.76 lbs/hr	16.79	10.76 lbs/hr	24.75
Carbon Monoxide	Attainment	2.05 lbs/hr	3.20	2.05 lbs/hr	4.72
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination BAT is compliance with emission limitations, the VE limitation, and the sulfur content limitation, along with the rolling 12-month hours of operation summation.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

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

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaiminants 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: _____