

Synthetic Minor Determination and/or Netting Determination

Permit To Install 02-20430

A. Source Description

Ohio Steel, Inc. will be a new steel processing facility, located near an existing steel fabrication shop in Hubbard, Ohio, which is located on the eastern border of Trumbull county, near the Pennsylvania line.

B. Facility Emissions and Attainment Status

There are currently no air emission sources at this location. It will be located in Trumbull County which is designated attainment for particulate(PE), ozone, sulfur dioxide(SOx), carbon monoxide(CO), and nitrogen oxides(NOx). Compliance with this PTI will ensure this facility operates as a minor stationary source.

C. Source Emissions

Ohio Steel is proposing to install a walking steel slab reheat furnace and a coiling furnace. Both units will be heated with natural gas. The slab reheat furnace will be used to heat steel slabs, which are sent to a hot mill for size reduction to steel plate, and steel coil. Steel destined for coil production is sent to the coiling furnace, where additional reduction and rolling occurs.

The slab reheat furnace has estimated potential burner sizing of 226 mm Btu/ hr heat input, while that of the coiling furnace is estimated at 10 mm Btu/hr. Based on emission factors supplied by the manufacturer and obtained in AP-42 , a USEPA publication, the potential to emit (PTE) based on maximum natural gas usage for these two furnace exceed the major threshold of 100 tons per year(TPY) for NOx , which would subject this facility to Title V permit requirements. The facility PTE would be approximately 101 TPY for NOx, 87 TPY for CO, and less than 10 TPY for the other pollutants.

The emission units will not operate at the maximum burner capacity, due to the fact that the furnaces retain heat, and gas will only be used to maintain operating temperatures, and to the fact production will not be run continuously. To limit emissions and avoid being a major facility, Ohio Steel plans to monitor natural gas consumption and limit its usage such that NOx emissions will remain below the 100 TPY level on a rolling, 12- month basis. These restriction will be federally enforceable and will be monitored through permitted record keeping and reporting requirements.

D. Conclusion

Ohio Steel will be permitted to limit natural gas usage on a facility wide , rolling 12-month basis. The facility will be required to record fuel usage, and to calculate the monthly and 12-month rolling emissions for NOx and CO. This will assure the facility remains below the 100 TPY threshold level of Title V permitting.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 02-20430

Fac ID: 0278030792

DATE: 4/28/2005

Ohio Steel, Inc.
Robert S. Gawryk
P.O. Box 1032
Warren, OH 44483

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: USEPA

NEDO

Eastgate Dev. & Transportation Study

WV

PA

TRUMBULL COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 02-20430 FOR AN AIR CONTAMINANT SOURCE FOR
Ohio Steel, Inc.**

On 4/28/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ohio Steel, Inc.**, located at **7845 Chestnut Ridge Rd., Hubbard**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-20430:

Walking beam slab reheat furnace.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 02-20430

Application Number: 02-20430
Facility ID: 0278030792
Permit Fee: **To be entered upon final issuance**
Name of Facility: Ohio Steel, Inc.
Person to Contact: Robert S. Gawryk
Address: P.O. Box 1032
Warren, OH 44483

Location of proposed air contaminant source(s) [emissions unit(s)]:
**7845 Chestnut Ridge Rd.
Hubbard, Ohio**

Description of proposed emissions unit(s):
Walking beam slab reheat furnace.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Ohio Steel, Inc.

Facility ID: 0278030792

PTI Application: 02-20430

Issued: To be entered upon final issuance

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 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

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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

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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.

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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>
Nitrogen Oxides (NO _x)	58.8
Carbon Dioxide (CO)	51.5
Particulate Emissions (PE)	4.8
Volatile Organic Compound (VOC)	3.5

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>
P001 - Walking Beam/Slab Reheat Furnace	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 1.72 pound per hour and 4.4 tons/year.
		Nitrogen oxides (NO _x) emissions shall not exceed 22.6 pounds per hour and 56.9 tons/year.
		Carbon monoxide (CO) emissions shall not exceed 18.9 pounds per hour and 47.8 tons/year.
		Organic compound (OC) emissions shall not exceed 1.24 pound per hour and 3.2 tons/year.
	OAC rule 3745-31-05(C)	Annual NO _x emissions for facility--See A.2.a.
	OAC rule 3745-17-07(A)(1)	Except as specified by rule, visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed twenty (20) percent opacity, as a six-minute average.
	OAC rule 3745-17-10	The emission limitation specified by this rule is less stringent than the

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emission limitation established
pursuant to OAC rule
3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The total annual emissions of NO_x from all emissions units at this facility (P001 and P002) shall be limited to 58.8 tons, as a rolling 12-month summation. This annual facility NO_x emission limitation shall be achieved by restricting the maximum quantity of natural gas burned.

B. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. The maximum quantity of natural gas which may be burned in emissions units P001 and P002 shall not exceed 1,226,400,000 standard cubic feet per year based on a rolling 12-month summation of fuel usage.
3. To ensure enforceability during the first twelve (12) months of operation following startup of these emissions units (P001 & P002), the permittee shall not exceed the natural gas usage limitations specified in the following table:

<u>CALENDAR MONTH(S) FOLLOWING STARTUP</u>	<u>ALLOWABLE CUMULATIVE TOTAL NATURAL GAS BURNED In STANDARD CUBIC FEET</u>
1	408,800,000
1-2	408,800,000
1-3	408,800,000
1-4	408,800,000
1-5	511,000,000
1-6	613,200,000
1-7	715,400,000
1-8	817,600,000
1-9	919,800,000
1-10	1,022,000,000
1-11	1,124,200,000
1-12	1,226,400,000

After the first 12 calendar months of operation following startup of each of these emissions units

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(P001 & P002), compliance with the annual natural gas usage limitation shall be based on a rolling, 12-month summation of the fuel usage.

C. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the amount of natural gas used by emissions units (P001 & P002) in standard cubic feet (scf).
3. The permittee shall maintain monthly records of the following information:
 - a. during the first 12 calendar months of operation following startup, the permittee shall record the natural gas usage in emissions units, P001 and P002, for each calendar month; and
 - b. beginning after the first 12 calendar months of operation following startup of this emissions unit, the rolling, 12-month summation of natural gas usage in emissions units, P001 and P002.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel usage limitation for emissions units, P001 and P002, and for the first 12 calendar months of operation, following startup of these emissions units, all exceedances of the maximum allowable fuel usage (per Table in Section B.3). These reports shall be sent to the Ohio EPA, Northeast District Office as required in Part I, Section A.2.b of the General Terms and Conditions of this permit.
3. The permittee shall submit an annual report which summarizes the following information:
 - a. The monthly and annual amount of natural gas used in emissions units, P001 and P002, in scf; and
 - b. The total annual emissions of NO_x, CO, PM, and total volatile organic compounds from emissions units, P001 and P002, for the previous calendar year.

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PTI Application: 02-20430
Issued

Facility ID: 0278030792

Emissions Unit ID: **P001**

This reports shall be submitted by January 31 of each year for operations during the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A. of these terms and condition shall be determined in accordance with the following method(s):
 - a. Emission Limitation : 22.6 lbs/hr and 56.9 tons/yr NO_x

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Applicable Compliance Method:

Hourly compliance shall be based on a one time calculation by using emission factors supplied by the manufacturer for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{NO}_x) = 0.226 \text{ MM scf/hr} \times 100 \text{ lb NO}_x/10\text{E6 scf (mfg. emission factor, and AP-42)} = 22.6 \text{ lbs/hr}$$

Annual emissions are determined by multiplying the emission factor by the annual natural gas usage and multiplying by 1007 BTU/scf and dividing by 2000 lbs/ton.

If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the hourly NO_x emission limit of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 7 or 7E.

- b. Emission Limitation: 1.72 lb/hr and 4.4 ton/yr PE

Applicable Compliance Method:

Hourly compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{PE}) = 0.226 \text{ MM scf/hr} \times 7.6 \text{ lb PE} / 10\text{E6 scf (AP-42)} = 1.72 \text{ lb/hr.}$$

Annual emissions are determined by multiplying the emission factor by the annual natural gas usage and multiplying by 1007 BTU/scf and dividing by 2000 lbs/ton.

- c. Emission Limitation: 18.9 lbs/hr and 47.8 tons/yr CO

Applicable Compliance Method:

Hourly compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{CO}) = 0.226 \text{ MM scf/hr} \times 84 \text{ lb CO} / 10\text{E6 scf (AP-42)} = 18.9 \text{ lbs/hr.}$$

Annual emissions are determined by multiplying the emission factor by the annual natural gas usage and multiplying by 1007 BTU/scf and dividing by 2000 lbs/ton.

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PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **P001**

- d. Emission Limitation: 1.24 lb/hr and 3.5 tons/yr VOC

Ohio Steel, Inc.

PTI Application: 02-20430

Issued

Facility ID: 0278030792

Emissions Unit ID: P001

Applicable Compliance Method:

Hourly compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{VOC}) = 0.226 \text{ MM scf/hr} \times 5.5 \text{ lb VOC/10E6 scf (AP-42)} = 1.24 \text{ lb/hr.}$$

Annual emissions are determined by multiplying the emission factor by the annual natural gas usage and multiplying by 1007 BTU/scf and dividing by 2000 lbs/ton.

- e. Emission Limitation: limit for visible particulate emissions- twenty (20) percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC Rule 3745-17-03(B)(3) using the methods and procedures specified in U.S.EPA Reference Method 9.

F. Miscellaneous Requirements

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35- 07: Sections A., B., C., D., and E.

Issued: **To be entered upon final issuance**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Coiling Furnace	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.08 pound per hour and 0.4 tons/year. Nitrogen oxides (NO _x) emissions shall not exceed 0.44 pounds per hour and 1.9 tons/year. Carbon monoxide (CO) emissions shall not exceed 0.84 pounds per hour and 3.7 tons/year. Volatile organic compound (VOC) emissions shall not exceed 0.06 pound per hour and 0.3 tons/year.
	OAC rule 3745-31-05(C)	Annual NO _x emissions for facility--See A.2.a.
	OAC rule 3745-17-07(A)(1)	Except as specified by rule, visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed twenty (20) percent opacity, as a six-minute average.
	OAC rule 3745-17-10	The emission limitation specified by this rule is less stringent than the

Ohio §
PTI A

Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

emission limitation established
pursuant to OAC rule
3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The total annual emissions of NO_x from all emissions units at this facility (P001 and P002) shall be limited to 58.8 tons, as a rolling 12-month summation. This annual facility NO_x emission limitation shall be achieved by restricting the maximum quantity of natural gas burned.

B. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.
2. The maximum quantity of natural gas which may be burned in emissions units P001 and P002 shall not exceed 1,226,400,000 standard cubic feet per year based on a rolling 12-month summation of fuel usage.
3. To ensure enforceability during the first twelve (12) months of operation following startup of these emissions units (P001 & P002), the permittee shall not exceed the natural gas usage limitations specified in the following table:

<u>CALENDAR MONTH(S) FOLLOWING STARTUP</u>	<u>ALLOWABLE CUMULATIVE TOTAL NATURAL GAS BURNED</u>
1	408,800,000
1-2	408,800,000
1-3	408,800,000
1-4	408,800,000
1-5	511,000,000
1-6	613,200,000
1-7	715,400,000
1-8	817,600,000
1-9	919,800,000
1-10	1,022,000,000
1-11	1,124,200,000
1-12	1,226,400,000

After the first 12 calendar months of operation following startup of each of these emissions units

Emissions Unit ID: P002

(P001 & P002), compliance with the annual natural gas usage limitation shall be based on a rolling, 12-month summation of the fuel usage.

C. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of the amount of natural gas used by emissions units (P001 & P002) in standard cubic feet (scf).
3. The permittee shall maintain monthly records of the following information:
 - a. during the first 12 calendar months of operation following startup, the permittee shall record the natural gas usage in emissions units, P001 and P002, for each calendar month; and
 - b. beginning after the first 12 calendar months of operation following startup of this emissions unit, the rolling, 12-month summation of natural gas usage in emissions units, P001 and P002.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel usage limitation for emissions units, P001 and P002, and for the first 12 calendar months of operation, following startup of these emissions units, all exceedances of the maximum allowable fuel usage (per Table in Section B.3). These reports shall be sent to the Ohio EPA, Northeast District Office as required in Part I, Section A.2.b of the General Terms and Conditions of this permit.
3. The permittee shall submit an annual report which summarizes the following information:
 - a. The monthly and annual amount of natural gas used in emissions units, P001 and P002, in scf; and
 - b. The total annual emissions of NO_x, CO, PM, and total volatile organic compounds from emissions units, P001 and P002, for the previous calendar year.

Issued: To be entered upon final issuance

This reports shall be submitted by January 31 of each year for operations during the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A. of these terms and condition shall be determined in accordance with the following method(s):
 - a. Emission Limitation : 0.44 lbs/hr and 1.9 tons/yr NO_x

Issued: To be entered upon final issuance

Applicable Compliance Method:

Hourly compliance shall be based on a one time calculation by using emission factors supplied by the manufacturer for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{NO}_x) = 0.010 \text{ MM scf/hr} \times 44.0 \text{ lb NO}_x/10\text{E}6 \text{ scf (mfg. emission factor)} = 0.44 \text{ lbs/hr}$$

Annual emissions are determined by multiplying the emission factor by the annual natural gas usage and multiplying by 1007 BTU/scf and dividing by 2000 lbs/ton.

If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the hourly NO_x emission limit of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 7 or 7E.

- b. Emission Limitation: 0.080 lb/hr and 0.4 ton/yr PE

Applicable Compliance Method:

Hourly compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{PE}) = 0.010 \text{ MM scf/hr} \times 7.6 \text{ lb PE}/10\text{E}6 \text{ scf (AP-42)} = 0.08 \text{ lb/hr.}$$

Annual emissions are determined by multiplying the emission factor by the annual natural gas usage and multiplying by 1007 BTU/scf and dividing by 2000 lbs/ton.

- c. Emission Limitation: 0.84 lbs/hr and 3.7 tons/yr CO

Applicable Compliance Method:

Hourly compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{CO}) = 0.010 \text{ MM scf/hr} \times 84 \text{ lb CO}/10\text{E}6 \text{ scf (AP-42)} = 0.84 \text{ lbs/hr.}$$

Annual emissions are determined by multiplying the emission factor by the annual natural gas usage and multiplying by 1007 BTU/scf and dividing by 2000 lbs/ton.

- d. Emission Limitation: 0.06 lb/hr and 0.3 tons/yr VOC

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Ohio Steel, Inc.

PTI Application: 02 20430

Issued

Facility ID: 0278030792

Emissions Unit ID: P002

Issued: To be entered upon final issuance

Applicable Compliance Method:

Hourly compliance shall be based on a one time calculation by using emission factors from AP-42, Section 1.4 (1998) for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{VOC}) = 0.010 \text{ MM scf/hr} \times 5.5 \text{ lb VOC/10E6 scf (AP-42)} = 0.06 \text{ lb/hr.}$$

Annual emissions are determined by multiplying the emission factor by the annual natural gas usage and multiplying by 1007 BTU/scf and dividing by 2000 lbs/ton.

- e. Emission Limitation: limit for visible particulate emissions- twenty (20) percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC Rule 3745-17-03(B)(3) using the methods and procedures specified in U.S.EPA Reference Method 9.

F. Miscellaneous Requirements

1. The following Terms and Conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC Rule 3745-35- 07: Sections A., B., C., D., and E.