

Facility ID: 0370010023 Issuance type: Title V Draft Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. None

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### b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

- P009 Hot Strip Mill
- Z007 Continuous Caster Cooling Water
- Z008 Continuous Caster Scale Pit
- Z009 Hot Mill Water Treatment Pond
- Z012 Melt Shop Alloy Bays & Bins
- Z013 #1 Hot Strip Bearing Room Cold Degreaser
- Z014 #2 Hot Strip Bearing Room Cold Degreaser
- Z015 Cold Mill Bearing Room Cold Degreaser
- Z017 Evaporator for Oil Recovery
- Z026 AOD Lime Storage Bins
- Z031 Hydraulic Shop Degreaser
- Z001 #1 Ladle Preheater
- Z002 #2 Ladle Preheater
- Z004 #3 Ladle Preheater
- Z005 #4 Ladle Preheater
- Z016 Cold Solvent Cleaners
- Z030 #0 Ladle Preheater

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0370010023 Emissions Unit ID: B010 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
82 mmBtu/hr, natural gas and/or no. 2 fuel oil-fired boiler (South Plant boiler No. 1)	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-18-06(D)	1.6 lbs SO2/mmBtu of actual heat input

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas and/or no. 2 fuel oil in this emissions unit.
2. The quality of oil burned in this emissions unit shall meet a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs/mmBtu of actual heat input.

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**III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas and/or no. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emissions rate (in lbs/mmBtu). (The sulfur dioxide emissions rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. Also, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during a calendar month.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

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**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or no. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record which shows a deviation of the allowable sulfur dioxide limitation specified in Section A.1 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

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**V. Testing Requirements**

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.  
  
Applicable Compliance Method:  
If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:  
0.020 lb PE/mmBtu of actual heat input  
  
Applicable Compliance Method:  
When firing natural gas, the permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (82 mmBtu/hr).  
  
When firing no. 2 fuel oil, and/or a combination of no. 2 fuel oil and natural gas, the permittee may determine compliance by multiplying the maximum hourly fuel oil consumption rate (gallons/hr) by the emission factor from AP-42, Table 1.3-1 (revised 9/98) of 2.0 lbs PE (filterable)/1000 gallons of oil used, and then dividing by the maximum heat input capacity of the boiler (82 mmBtu/hr).  
  
If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).
  - c. Emission Limitation: 1.6 pounds sulfur dioxide/mmBtu of actual heat input  
  
Applicable Compliance Method: When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received or each daily sample collected during a calendar month meets the limitation.  
  
If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon an average for the calendar month of the calculated sulfur dioxide emission rates for all of the shipments during the calendar month.  
  
When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.  
  
If required, compliance with the limitation above shall be determined in accordance with Method 6 of 40 CFR, Part 60, Appendix A.

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**VI. Miscellaneous Requirements**

1. The permittee installed this emissions unit in June 1974 without first applying for and obtaining a Permit to Install (PTI), in violation of OAC rule 3745-31-02. Therefore, the permittee shall perform the following in order to bring the emissions unit into compliance:
  - a. submit a complete PTI application within 2 months of the issuance of this permit; and
  - b. obtain a PTI within 8 months following the issuance of this permit.

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Facility ID: 0370010023 Emissions Unit ID: B010 Issuance type: Title V Draft Permit

#### B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

#### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. Additional Terms and Conditions			
1.	None		

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#### II. Operational Restrictions

1. None

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#### III. Monitoring and/or Record Keeping Requirements

1. None

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#### IV. Reporting Requirements

1. None

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#### V. Testing Requirements

1. None

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#### VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0370010023 Emissions Unit ID: B011 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
82 mmBtu/hr, natural gas and/or no. 2 fuel oil-fired boiler (South Plant boiler No. 2)	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)	0.020 lb PE/mmBtu of actual heat input
	OAC rule 3745-18-06(D)	1.6 lbs SO <sub>2</sub> /mmBtu of actual heat input

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas and/or no. 2 fuel oil in this emissions unit.
2. The quality of oil burned in this emissions unit shall meet a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 lbs/mmBtu of actual heat input.

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**III. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas and/or no. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emissions rate (in lbs/mmBtu). (The sulfur dioxide emissions rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. Also, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during a calendar month.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.

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**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or no. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record which shows a deviation of the allowable sulfur dioxide limitation specified in Section A.1 of this permit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

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**V. Testing Requirements**

1. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
- Applicable Compliance Method:  
If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
- b. Emission Limitation:  
0.020 lb PE/mmBtu of actual heat input
- Applicable Compliance Method:  
When firing natural gas, the permittee may determine compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor from AP-42, Table 1.4-2 (revised 7/98) of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the boiler (82 mmBtu/hr).
- When firing no. 2 fuel oil, and/or a combination of no. 2 fuel oil and natural gas, the permittee may determine compliance by multiplying the maximum hourly fuel oil consumption rate (gallons/hr) by the emission factor from AP-42, Table 1.3-1 (revised 9/98) of 2.0 lbs PE (filterable)/1000 gallons of oil used, and then dividing by the maximum heat input capacity of the boiler (82 mmBtu/hr).
- If required, compliance with the PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(9).
- c. Emission Limitation: 1.6 pounds sulfur dioxide/mmBtu of actual heat input
- Applicable Compliance Method: When firing fuel oil, except as provided below, compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received or each daily sample collected during a calendar month meets the limitation.
- If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon an average for the calendar month of the calculated sulfur dioxide emission rates for all of the shipments during the calendar month.
- When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.
- If required, compliance with the limitation above shall be determined in accordance with Method 6 of 40 CFR, Part 60, Appendix A.

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VI. **Miscellaneous Requirements**

1. The permittee installed this emissions unit in June 1974 without first applying for and obtaining a Permit to Install (PTI), in violation of OAC rule 3745-31-02. Therefore, the permittee shall perform the following in order to bring the emissions unit into compliance:
  - a. submit a complete PTI application within 2 months of the issuance of this permit; and
  - b. obtain a PTI within 8 months following the issuance of this permit.

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Facility ID: 0370010023 Emissions Unit ID: B011 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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> |
|---|---|--------------------------------------|--|
| 2. <b>Additional Terms and Conditions</b> |   |                                      |  |
| 1. None                                   |   |                                      |  |

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0370010023 Emissions Unit ID: F002 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
paved roadways and parking areas (see Section A.I.2.a.)	OAC rule 3745-17-07(B)(4)  OAC rule 3745-17-08(B), (B)(8), (B)(9)	no visible particulate emissions except for 6 minutes during any 60-minute period  reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.c, A.I.2.d, and A.I.2.f through A.I.2.j)
unpaved roadways and parking areas (see Section A.I.2.b.)	OAC rule 3745-17-07(B)(5)  OAC rule 3745-17-08(B), (B)(2)	no visible particulate emissions except for 13 minutes during any 60-minute period  reasonably available control measures that are

sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.2.e through A.2.j)

**2. Additional Terms and Conditions**

- a. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

(a)

Paved roadways and parking areas identifications:

P1  
P2  
P3  
P4  
P5  
P6  
P7  
P8  
P9  
P10

- b. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Unpaved roadways and parking areas identifications:

U1  
U2

- c. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by sweeping at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with chemical stabilization at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas using chemical stabilization at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- f. The needed frequencies 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 a paved or unpaved 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 above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- g. 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 with the control measure(s) specified above for paved surfaces. 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.
- h. 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.
- i. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- j. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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**II. Operational Restrictions**

1. None

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### III. Monitoring and/or Record Keeping Requirements

- a. Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadways and parking areas in accordance with the following frequencies:
  1. paved roadways and parking areas minimum inspection frequency  
all daily
  - unpaved roadways and parking areas minimum inspection frequency  
all daily
2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. 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 above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
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 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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### IV. Reporting Requirements

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

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### V. Testing Requirements

1. Compliance with the emission limitation for the paved and unpaved roadways and parking areas 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)(d) of OAC rule 3745-17-03.

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### VI. Miscellaneous Requirements

1. None

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Facility ID: 0370010023 Emissions Unit ID: F002 Issuance type: Title V Draft Permit

#### B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

#### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. Additional Terms and Conditions			
1.	None		

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#### II. Operational Restrictions

1. None

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#### III. Monitoring and/or Record Keeping Requirements

1. None

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#### IV. Reporting Requirements

1. None

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#### V. Testing Requirements

1. None

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#### VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0370010023 Emissions Unit ID: P013 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
no. 2 continuous pickle line, with wet scrubber	OAC rule 3745-17-07(A)	20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(B)	13.6 lbs particulate emissions (PE)/hr
	OAC rule 3745-31-05 (PTI #03-0406)	8.16 lbs hydrochloric acid (HCl) mist/hr 35.74 tons per year HCl mist
		0.036 lb sulfuric acid (H2SO4) mist/hr 0.15 ton per year H2SO4 mist
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B) and 3745-17-07(A).

**2. Additional Terms and Conditions**

- a. The permittee shall employ a wet scrubber to control all of the PE and H2SO4 and HCl emissions from this emissions unit. The wet scrubber shall have a minimum overall control efficiency of 97 percent (by weight) for H2SO4 and for HCl, individually.

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**II. Operational Restrictions**

- 1. The wet scrubber water supply pressure shall be continuously maintained at a value of not less than 1.50 pounds per square inch (gauge) at all times while the emissions unit is in operation.
- 2. The wet scrubber water flow rate shall be continuously maintained at a value of not less than 8.70 gallons per minute at all times while the emissions unit is in operation.
- 3. The pH of the wet scrubber liquor shall be maintained within the range established during the most recent emission testing that demonstrated the emissions unit was in compliance.

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**III. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall properly operate and maintain equipment to continuously monitor and record the water supply pressure, the water flow rate and the pH of the scrubber liquor while the emissions unit is in operation. The monitoring devices and recorder(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The water supply pressure, in psig, on a daily basis.
- b. The water flow rate, in gpm, on daily basis.
- c. The pH of the scrubber liquor, on a once/shift basis.
- d. A log or record of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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**IV. Reporting Requirements**

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

- a. The water supply pressure.
  - b. The water flow rate.
  - c. The scrubber liquor pH.

All quarterly reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

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V. **Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates, hydrochloric acid and sulfuric acid, and the control efficiency of the wet scrubber.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:
    - i. PE: Methods 1 - 5, 40 CFR Part 60, Appendix A;
    - ii. hydrochloric acid: Method 26, 40 CFR Part 60, Appendix A; and
    - iii. sulfuric acid: Method 8, 40 CFR Part 60, Appendix A.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
2. During the emission testing required above, the permittee shall record the pH of the scrubber liquor every 5 minutes.
3. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - a. Emission limitation:  
13.6 lbs PE/hr
 

Applicable compliance method:  
The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(10).
  - b. Emission Limitation: 20 percent opacity, as a six-minute average, except as provided by rule
 

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
  - c. Emission limitations: 8.16 lbs HCl mist/hr and 35.74 tons per year HCl mist
 

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Method 26.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

- d. Emission limitations: 0.036 lb H2SO4 mist/hr and 0.15 ton per year H2SO4 mist

Applicable compliance method:

The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Method 8.

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0370010023 Emissions Unit ID: P013 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0370010023 Emissions Unit ID: P015 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
tandem mill, with settling chamber	OAC rule 3745-17-07 (A)	20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(B)(1)	4.96 lbs particulate emissions (PE)/hr

2. **Additional Terms and Conditions**

- a. The permittee shall employ a settling chamber to control all of the PE from this emissions unit.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack associated with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of each visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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IV. **Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack associated with this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to

the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - a. Emission Limitation: 20 percent opacity, as a six-minute average, except as provided by rule
 

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
  - b. Emission limitation: 4.96 lbs PE/hr
 

Applicable compliance method:  
The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The permittee may demonstrate compliance with the hourly PE limitation by multiplying the maximum process weight rate (100 tons per hour) by an emission factor of 0.31 lb PE/ton\*, and then multiplying by a control factor of (1.0 - 0.9).\*\*

\* This emission factor was derived based upon the results of emission testing conducted, in September 1995, on a similar emissions unit at an AK Steel facility in Butler, PA.

\*\* The control efficiency of the settling chamber is estimated to be 90%.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of the permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for PE: Methods 1 - 5 of 40 CFR, Part 60, Appendix A
 

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0370010023 Emissions Unit ID: P015 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
<b>2. Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 0370010023 Emissions Unit ID: P025 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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 lime flux storage bin, with baghouse	OAC rule 3745-17-07(A)	20 percent opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(B)	7.68 lbs particulate emissions (PE)/hr

2. **Additional Terms and Conditions**

- a. The permittee shall employ a baghouse to control all of the PE from this emissions unit.
  - (a) The baghouse employed shall achieve an outlet emission rate of not greater than 0.0052 grain of PE per dry standard cubic foot of exhaust gases. The baghouse controlling this emissions unit also serves as control equipment for emissions unit P902 and is subject to an outlet grain loading limitation of 0.0052 gr/dscf and an opacity limitation of 3%, pursuant to 40 CFR, Part 60, Subpart AA.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall conduct visible emissions (VE) observations for the baghouse serving this emissions unit in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
2. The VE observations shall be conducted at least once per day when one or more of the furnaces (emissions units P902, P903 and P904) are operating in the melting and refining period.
3. The VEs shall be taken for at least three 6-minute periods. The opacities shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6-minute observations shall be required. In this case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause or location of visible emissions observed during a single incident.
4. The permittee shall maintain copies of all daily opacity observations required above. The records shall identify the persons responsible for conducting the readings and verify that their Method 9 certifications are up-to-date.

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IV. **Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which the opacity limitation for the baghouse was exceeded and (b) describe any corrective actions taken to eliminate the opacity exceedances. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - a. Emission Limitation: 20 percent opacity, as a six-minute average, except as provided by rule
 

Applicable Compliance Method: If required, compliance with the VE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
  - b. Emission limitation: 7.68 lbs PE/hr
 

Applicable compliance method:  
The permittee shall be deemed to be in compliance with the hourly limitation for this emissions unit if the results of the emission testing conducted in accordance with the methods and procedures outlined in section V.1 of the terms and conditions of the permit for emissions unit P902 shows a PE grain loading not

exceeding 0.0052 grain per dry standard cubic foot of exhaust gases.

The permittee may determine compliance with the hourly PE limitation by multiplying the maximum process weight rate (tons/hr) by the emission factor from AP-42, Table 11.17-4 [for product transfer and conveying] of 2.2 lbs PE/ton (uncontrolled), and then multiplying by a control factor of (1.0 - 0.99).\*

If required, the permittee shall demonstrate compliance in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

\* The control efficiency of the baghouse is estimated to be 99%.

- c. Emission Limitation:  
0.0052 gr/dscf (from the baghouse stack)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of the terms and conditions of the permit for emissions unit P902.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0370010023 Emissions Unit ID: P025 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 0370010023 Emissions Unit ID: P062 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
thin slab continuous caster, with baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05 (PTI 03-7503)	1.13 lbs PE/hr (from the baghouse stack) 4.95 tons PE/yr (from the baghouse stack)
		0.85 lb PM10/hr (from the baghouse stack) 3.72 ton PM10/yr (from the baghouse stack)
		0.0022 grain PE/dscf (from the baghouse stack)
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

2. **Additional Terms and Conditions**

- a. The permittee shall employ a baghouse to control all of the PE from this emissions unit.

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 5.0 inches of water while the emissions unit is in operation.

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating

manual(s). The permittee shall record the pressure drop across the baghouse on a once per shift basis.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of each visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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#### V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - a. Emission Limitation: 20 percent opacity, as a six-minute average, except as provided by rule
 

Applicable Compliance Method: If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitations:
 

1.13 lbs PE/hr and 4.95 tons PE/yr

Applicable compliance method:  
The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

The permittee may determine compliance with the hourly PE limitation by multiplying the maximum process weight rate (tons/hr) by the emission factor of 0.27 lb PE/ton (uncontrolled)\*, and then multiplying by a control factor of (1.0 - 0.99).\*\*

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

\* This emission factor was derived based upon the results of emission testing conducted on April 30, 1996 for this emissions unit.

\*\* The control efficiency of the baghouse is estimated to be 99%.
  - c. Emission Limitations:
 

0.85 lb PM10/hr and 3.72 tons PM10/yr

Applicable compliance method:  
The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A (including back half and size distribution) or Methods 201 or 201A.

The permittee may determine compliance with the hourly PE limitation by multiplying the maximum process weight rate (tons/hr) by the emission factor of 0.27 lb/ton (uncontrolled)\*, and then multiplying by a control factor of (1.0 - 0.99).\*\*

Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

\* This emission factor was derived based on the results of emission testing conducted on April 30, 1996 for this emissions unit (all PE will be assumed to be PM10).

\*\*\* The control efficiency of the baghouse is estimated to be 99%.

- d. Emission Limitation:  
0.0022 grain PE/dscf (from the baghouse stack)  
  
Applicable compliance method:  
The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.
- 2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of the permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE and PM10.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates:
    - i. PE: Methods 1 - 5 of 40 CFR Part 60, Appendix A; and
    - ii. PM10: Methods 1 - 5 of 40 CFR Part 60, Appendix A (including back half and size distribution) or Methods 201 or 201A.
 Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- 3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).  
  
Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.  
  
A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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VI. **Miscellaneous Requirements**

- 1. None

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**Facility ID: 0370010023 Emissions Unit ID: P062 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 0370010023 Emissions Unit ID: P063 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
315 mmBtu/hr, natural gas-fired slab reheat furnace	OAC rule 3745-31-05 (PTI #03-7606)	12.02 lbs nitrogen oxides (NOx)/hr 1.27 lbs particulate emissions (PE)/hr 0.96 lb PM10/hr 2.53 lbs carbon monoxide (CO)/hr

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

OAC rule 3745-17-07

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

OAC rule 3745-17-11

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

## 2. Additional Terms and Conditions

- (a) None

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### II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

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### III. Monitoring and/or Record Keeping 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 perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack associated with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- the color of the emissions;
  - whether the emissions are representative of normal operations;
  - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - the total duration of each visible emission incident; and
  - any corrective actions taken to eliminate the visible emissions.

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### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the the stack associated with this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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### V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing for NO<sub>x</sub> shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration.
  - The emission testing for CO, PE and PM<sub>10</sub> shall be conducted within 3 months after issuance of the permit.
  - The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NO<sub>x</sub>, CO, PE and PM<sub>10</sub>.
  - The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:
    - NO<sub>x</sub>: Method 7 of 40 CFR Part 60, Appendix A;
    - PE: Methods 1 - 5 of 40 CFR Part 60, Appendix A;
    - CO: Method 10 of 40 CFR Part 60, Appendix A; and
    - PM<sub>10</sub>: Methods 1 - 5 of 40 CFR Part 60, Appendix A (including back half and size distribution) or Methods 201 or 201A.

Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.
  - The tests shall be conducted while the emissions unit is operating at or near its maximum capacity,

unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Compliance Methods Requirements: Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
- a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
- Applicable Compliance Method:  
If required, compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
- b. Emission Limitation:  
12.02 lbs NOx/hr
- Applicable Compliance Method:  
The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Method 7.
- c. Emission Limitation:  
2.53 lbs CO/hr
- Applicable Compliance Method:  
The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Method 10.
- d. Emission Limitation:  
1.27 lbs PE/hr
- Applicable Compliance Method:  
The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.
- e. Emission Limitation:  
0.96 lb PM10/hr
- Applicable Compliance Method: .  
The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A (including back half and size distribution) or Methods 201 or 201A.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 0370010023 Emissions Unit ID: P063 Issuance type: Title V Draft Permit**

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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**2. Additional Terms and Conditions**

- 1. None

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 0370010023 Emissions Unit ID: P902 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>	
#8 electric arc furnace, 125-ton holding capacity, with baghouse	OAC rule 3745-17-07(A)	See A.I.2.a.	
	OAC rule 3745-17-07(B)	See A.I.2.a.	
	OAC rule 3745-17-11(B)	See A.I.2.b.	
	OAC rule 3745-17-08	See A.I.2.g.	
	OAC rule 3745-18-06(E)	See A.I.2.c	
	OAC rule 3745-31-05(A) (PTI 03-7726)	12.3 lbs particulate emissions (PE)/hr [from the baghouse serving this emissions unit]  52.7 tons PE/yr [from the baghouse serving this emissions unit]  93.2 lbs carbon monoxide (CO)/hr [from the baghouse serving this emissions unit]  901.1 tons CO/rolling, 12-month period (for emissions units P902 and P903, combined)  40.8 lbs nitrogen oxidex (NOx)/hr [from the baghouse serving this emissions unit]  394.1 tons NOx/rolling, 12-month period (for emissions units P902 and P903, combined)  1.6 lbs sulfur dioxide (SO2)/hr [from the baghouse serving this emissions unit] 7.0 tons SO2/yr [from the baghouse serving this emissions unit]  14.2 lbs volatile organic compounds (VOC)/hr [from the baghouse serving this emissions unit]  62.4 tons VOC/yr [from the baghouse serving this emissions unit]  0.007 lb lead (Pb)/hr [from the baghouse serving this emissions unit]  0.03 ton Pb/yr [from the baghouse serving this emissions unit]  0.0007 lb mercury (Hg)/hr [from the baghouse serving this emissions unit]  0.003 ton Hg/yr [from the baghouse serving this emissions unit]  0.06 lb fluoride (F)/hr [from the baghouse serving this emissions unit]  0.26 ton F/Yr [from the baghouse serving this emissions unit]	
	40 CFR 60, Subpart AAa	See A.I.2.d and e.	
	<b>2. Additional Terms and Conditions</b>		
	a.	The VE limitation specified by this rule is less stringent than the limitation established pursuant to 40 CFR, Subpart AAa.	
	b.	The PE limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
	c.	The SO2 emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
	d.	The permittee shall not cause to be discharged into the atmosphere gases from the electric arc furnace (EAF) which:	
		i. exit from the baghouse and contain PE in excess of 12 milligrams (mg)/dry standard cubic meter (dscm) [0.0052 gr/dscf];	
		ii. exit from the baghouse and exhibit 3 percent opacity or greater, as a 6-minute average; and	
		iii. exit from the shop [the building housing one or more EAFs and/or argon-oxygen decarbonization	

- (AOD) vessels] and, due solely to the operations of any affected EAF or AOD vessel(s), exhibit 6 percent opacity or greater, as a 6-minute average.
- e. The permittee shall not cause to be discharged into the atmosphere from the dust handling system any gases which exhibit 10 percent opacity or greater, as a 6-minute average.
  - f. The permittee shall not cause to be discharged fugitive PE from the melt shop and dust silos attributed to the EAFs (emissions units P902 and P903, combined) in excess of 19.8 tons per year.
  - g. The RACM requirements specified by this rule are less stringent than the control measures/requirements established pursuant to 40 CFR 60, Subpart AAa.

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## II. Operational Restrictions

1. The maximum pressure in the free space inside the EAF and the control system's fan motor amperes range, when the EAF is operating in the meltdown and refining periods, shall not exceed the following:
  - a. static pressure : - 0.0060 inch of water; and
  - b. fan motor amperes ranges:
    - i. #1 fan (amps): 136 to 278; and
    - ii. #2 fan (amps): 134 to 273.

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## III. Monitoring and/or Record Keeping Requirements

1. In lieu of installing a continuous monitoring system for measurement of opacity, observations of the opacity of the visible emissions (VEs) from the baghouse shall be performed by a certified VE observer as follows:
  - a. The VE observations from the baghouse serving this emissions unit shall be conducted in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
  - b. The VE observations shall be conducted at least once per day when one or more of the furnaces (emissions units P902, P903 and P904) are operating in the melting and refining period.
  - c. The VEs shall be taken for at least three 6-minute periods. The opacities shall be recorded for any point (s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6-minute observations shall be required. In this case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause or location of visible emissions observed during a single incident.
  - d. The permittee shall maintain copies of all daily opacity observations required above. The records shall identify the persons responsible for conducting the readings and verify that their Method 9 certifications are up-to-date.
2. The permittee shall check and record on a once-per-shift basis the furnace static pressure, in inches of water, and either: check and record the control system fan motor amperes and damper positions on a once-per-shift basis; install, calibrate, operate and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and check and record damper positions on a once-per-shift basis. The monitoring devices may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result. The flow rate monitoring devices shall have an accuracy of +/-10 percent over its normal operating range and shall be calibrated according to the manufacturer's instructions. The permittee may be required to demonstrate the accuracy of the monitoring devices relative to Methods 1 and 2 of appendix A of 40 CFR Part 60.
3. When the permittee is required to demonstrate compliance with the VE limitation in section A.I.2.d.iii. and at any other time, the Director (the appropriate Ohio EPA District Office or local air agency) may require that either the control system fan motor amperes and all damper positions, or the volumetric flow rate through each separately ducted hood, or the volumetric flow rate at the control device inlet and all damper positions shall be determined during all periods in which a hood is operated for the purpose of capturing emissions.
 

The permittee may petition the Director for reestablishment of these parameters whenever the permittee can demonstrate to the Administrator's satisfaction that the affected facility operating conditions upon which the parameters were previously established are no longer applicable. The values of these parameters as determined during the most recent demonstration of compliance shall be maintained at the appropriate levels for each applicable period. Operation at other than baseline values will be considered by the Director (the appropriate Ohio EPA District Office or local air agency) to be unacceptable operation and maintenance of the control system.
4. The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture systems (i.e., pressure sensors, dampers, and damper switches). These inspections shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion. Any deficiencies shall be recorded and proper maintenance performed. The permittee may petition the

Director (the appropriate Ohio EPA District Office or local air agency) to approve any alternative to monthly operational status inspections that will provide a continuous record of the operation of each emission capture system.

5. The permittee shall calibrate, operate and maintain monitoring devices that allow the pressure in the free space inside the EAF to be monitored. The monitoring devices may be installed in any appropriate location in the EAF's ducts prior to the introduction of ambient air such that reproducible results will be obtained. The pressure monitoring devices shall have an accuracy of +/-5 mm of water gauge over their normal operating range and shall be calibrated according to the manufacturer's instructions.
6. Except as provided for in section A.III.7, when the permittee of an EAF controlled by a direct-shell evacuation control (DEC) system is required to demonstrate compliance with the VE limitation in section A.I.2.d.iii, and at any other time the Director (the appropriate Ohio EPA District Office or local air agency) may require, the pressure in the free space inside the furnace shall be determined during the meltdown and refining period (s) using the monitoring device required pursuant to section A.III.5 above. The permittee may petition the Director (the appropriate Ohio EPA District Office or local air agency) for reestablishment of the pressure whenever the permittee can demonstrate to the the Director's (the appropriate Ohio EPA District Office's or local air agency's) satisfaction that the EAF operating conditions upon which the pressures were previously established are no longer applicable. The pressure determined during the most recent demonstration of compliance shall be maintained at all times when the EAF is operating in a meltdown and refining period. Operation at higher pressures may be considered by the Director (the appropriate Ohio EPA District Office or local air agency) to be unacceptable operation and maintenance of the affected facility.

Based upon the most recent demonstration of compliance, both the maximum pressure (i.e., the pressure shall not be any more positive) in the free space inside the EAF and the control systems fan motor amperes range, when the EAF was operating in the meltdown and refining periods, are identified below:

- a. static pressure : - 0.0060 inch of water; and
- b. fan motor amperes ranges:
  - i. #1 fan (amps): 136 to 278; and
  - ii. #2 fan (amps): 134 to 273.
7. A furnace static pressure monitoring device is not required on any EAF equipped with a DEC system if observations of shop opacity are performed by a certified visible emission observer as follows: Shop opacity observations shall be conducted at least once per day when the furnace is operating in the meltdown and refining period. Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop taken in accordance with Method 9. Shop opacity shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one observation of shop opacity will be required. In this case, the shop opacity observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.
 

The permittee shall maintain daily records of all shop opacity observations.
8. The permittee shall calculate and maintain each month the following information for emissions units P902 and P903, combined.
  - a. the number of melts that occurred;
  - b. the type of steel produced in each melt (carbon and/or stainless steel);
  - c. the tons of steel produced in each melt;
  - d. the total tons of each type of steel produced;
  - e. the total CO emissions, in tons, calculated as follows:
    - i. for stainless steel, multiply the amount of stainless steel produced, in tons (from section 8.d.) by the emission factor of 1.3 lbs CO/ton of steel produced\*, and then divide by 2000;
    - ii. for carbon steel, multiply the amount of carbon steel produced, in tons (from section 8.d.) by the emission factor of 1.7 lbs CO/ton of steel produced\*, and then divide by 2000; and
    - iii. add e.i. + e.ii.
 

\* based upon the results of the most recent emission testing conducted for this emissions unit
  - f. the total NOx emissions, in tons, calculated as follows:
    - i. for stainless steel, multiply the amount of stainless steel produced, in tons (from section 8.d.) by the emission factor of 0.66 lb NOx/ton of steel produced\*, and then divide by 2000;
    - ii. for carbon steel, multiply the amount of carbon steel produced, in tons (from section 8.d.) by the emission factor of 0.43 lb NOx/ton of steel produced\*, and then divide by 2000; and
    - iii. add f.i. + f.ii.
 

\* based on the results of the most recent emission testing conducted for this emissions unit
  - g. the rolling, 12 month summation of the monthly CO emission rates, in tons; and
  - h. the rolling, 12-month summation of the monthly NOx emission rates; in tons.

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**IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which the opacity limitation for the baghouse was exceeded and (b) describe any corrective actions taken to eliminate the opacity exceedances. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all periods of time during which the static pressure in the free space inside the furnace exceeded the values in section A.II.1 of this permit;
  - b. all periods of time during which any of the control system fan motor ampere values were outside the ranges in section A.II.1 of this permit; and
  - c. all periods of time during which the hoods and/or the baghouse were operated at volumetric flow rates lower than those established in section A.III.3 of this permit.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the shop opacity observations were in excess of the limit specified in section A.I.2.d.iii of this permit.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the limitations (for emissions units P902 and P903, combined) of 901.1 tons of CO/rolling, 12-month period and 394.1 tons of NOx/rolling, 12-month period.
5. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

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**V. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for Hg, CO, PE, NOx and VOC. The permittee shall be deemed to be in compliance with the 12.3 lbs PE/hr and 0.0052 grain PE/dscf limitations for this emissions unit and the hourly and/or grain loading PE limitations for the other emissions unit (i.e., P025) vented to this baghouse only if the testing pursuant to this term and condition shows a PE grain loading not exceeding 0.0052 grain per dry standard cubic foot of exhaust gases.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates:
    - i. Hg: Method 29 of 40 CFR, Part 60, Appendix A;
    - ii. PE: Method 5D of 40 CFR, Part 60, Appendix A;
    - iii. NOx: Method 7 of 40 CFR Part, 60, Appendix A;
    - iv. CO: Method 10 of 40 CFR, Part 60, Appendix A; and
    - v. VOC: Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.
  - d. The test(s) for PE shall be conducted while emissions units P902 and P025 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
  - e. The tests for Hg, NOx, CO and VOC shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The tests may be conducted on the gas stream exiting this emissions unit or at the inlet to the baghouse before it combines with the gas streams from the other emissions unit.  
\* Testing for Hg emissions shall be performed while melting the maximum amount possible of no. 2 bundles and frag scrap.

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the

- submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
2. The written report described in section A.V.1. above, for the results of the PE testing, shall also include the following information:
    - a. facility name and address;
    - b. plant representative;
    - c. make and model of process, control device, and continuous monitoring equipment;
    - d. flow diagram of process and emission capture equipment including other equipment or process(es) ducted to the same control device;
    - e. rated (design) capacity of process equipment;
    - f. list of charge and tap weights and materials;
    - g. heat times, including start and stop times and a log of process operation, including periods of no operation during testing and the pressure inside the EAF's direct shell evacuation control system;
    - h. control device operating log;
    - i. reference Method 9 data;
    - j. test dates and test times;
    - k. test company;
    - l. test company representative;
    - m. test observers from outside agency;
    - n. description of test methodology used, including any deviation from standard reference methods;
    - o. schematic of sampling location;
    - p. number of sampling points;
    - q. description of sampling equipment;
    - r. listing of sampling equipment calibrations and procedures;
    - s. field and laboratory data sheets;
    - t. description of sample recovery procedures;
    - u. sampling equipment leak check results;
    - v. description of quality assurance procedures;
    - w. notation of sample blank corrections; and
    - x. sample emission calculations.
  3. During the emission testing required in section A.V.1., the permittee shall also perform the following:
    - a. not add gaseous diluents to the effluent gas stream after the fabric in any pressurized fabric filter collector, unless the amount of dilution is separately determined and considered in the determination of emissions;
    - b. obtain and record the information required in sections A.III.3, A.III.6 and A.III.7; and
    - c. record the following information for all heats covered by the emission testing:
      - i. the charge weights and materials, and tap weights and materials; and
      - ii. the heat times, including start and stop times, and a log of process operation, including periods of no operation during testing and the pressure inside during testing and the pressure inside during testing and the pressure inside.
  4. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
    - a. Emission Limitations:  
12.3 lbs of PE/hr and 52.7 tons of PE/yr  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of the terms and conditions of this permit.  
  
Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
    - b. Emission Limitation:  
901.1 tons CO/rolling, 12-month period (for emissions units P902 and P903, combined)  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the emission limitation above through the record keeping requirements specified in section A.III.8 of this permit.
    - c. Emission Limitation:  
394.1 tons NOx/rolling, 12-month period (for emissions units P902 and P903, combined)  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the annual emission limitation above through the record keeping requirements specified in section A.III.8 of this permit.
    - d. Emission Limitation:  
19.8 tons fugitive PE/yr  
  
Applicable Compliance Method:

The permittee may determine compliance with the annual fugitive PE limitation as follows:

- i. multiply the maximum annual production rate (tons/yr) by the emission factor of 1.4 lbs fugitive PE/ton [for charging, tapping and slagging, from AP-42, Table 7.5-1(revised 10/86)], and then multiply by a control factor of (1-.98)\*;
- ii. multiply the maximum annual production rate (tons/yr) by an emission factor of 0.12 lb fugitive PE/ton [for Metallic Mineral Processing, Material Handling and Transfer, from AP-42, Table 8.23-1(revised 8/82)], and then multiply by a control factor of (1-0.9)\*\*; and
- iii. add d.i + d.ii.

\* The capture efficiency supplied by the company is estimated to be 98%.

\*\* The capture efficiency supplied by the company is estimated to be 90%.

- e. Emission Limitation:  
40.8 lbs of NOx/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Method 7.

- f. Emission Limitations:  
1.6 lbs of SO2/hr and 7.0 tons of SO2/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly emission limitation above by multiplying the maximum process weight rate (51.8 tons/hr) by the appropriate emission factor from section A.VI.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly SO2 emission limitation in accordance with 40 CFR, Part 60, Appendix A, Method 6.

Compliance with annual emission limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

- g. Emission Limitations:  
14.2 lbs of VOC/hr and 62.4 tons of VOC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 18, 25 or 25A.

Compliance with annual emission limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly emission limitation by 8760 and then dividing by 2000).

- h. Emission Limitations:  
0.007 lb of Pb/hr and 0.03 ton of Pb/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly emission limitation above by multiplying the maximum process weight rate (51.8 tons/hr) by the appropriate emission factor from section A.VI.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly Pb emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 29.

Compliance with annual emission limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

- i. Emission Limitations:  
0.0007 lb of Hg/hr and 0.003 ton of Hg/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of the terms and conditions of this permit.

Compliance with annual emission limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

- j. Emission Limitations:  
0.06 lb of F/hr and 0.26 ton of F/yr

## Applicable Compliance Method:

The permittee may determine compliance with the hourly emission limitation above by multiplying the maximum process weight rate (51.8 tons/hr) by the appropriate emission factor identified in section A.VI.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly FI emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 13.

Compliance with annual emission limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

## k. Emission Limitation:

12 mg/dscm (0.0052 gr/dscf) from the baghouse

## Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

## l. Emission Limitation:

3 percent opacity, as a 6-minute average (from the baghouse)

## Applicable Compliance Method:

If required, the permittee shall determine compliance with the opacity restriction above in accordance with 40 CFR, Part 60, Appendix A, Method 9.

## m. Emission Limitation:

6 percent opacity, as a 6-minute average (from a shop and, due solely to the operations of any affected EAF vessel(s))

## Applicable Compliance Method:

If required, the permittee shall determine compliance with the opacity restriction above in accordance with 40 CFR, Part 60, Appendix A, Method 9.

## n. Emission Limitation:

10 percent opacity, as a 6-minute average (from the dust handling system)

## Applicable Compliance Method:

If required, the permittee shall determine compliance with the opacity restriction above in accordance with 40 CFR, Part 60, Appendix A, Method 9.

## o. Emission Limitation:

93.2 lbs of CO/hr

## Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Method 10. The permittee may also demonstrate compliance with the hourly emission limitation above by multiplying the maximum process weight rate (51.8 tons/hr) by the appropriate emission factor from section A.VI.1 of this permit.

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VI. **Miscellaneous Requirements**

- The following emission factors were derived from the results of emission testing conducted at this facility, from 1995 through 1997, during the production of both carbon and stainless steel. These emission factors are based on the highest emission rate obtained for each pollutant during testing for both carbon and stainless steel (the emission factors below shall continually be updated based on the results of the most recent emission testing that demonstrated the emissions unit was in compliance):

carbon steel -  
CO: 1.7 lbs/ton  
NOx: 0.43 lb/ton  
VOC: 0.16 lb/ton  
SO2: 0.009 lb/ton  
lead: 0.00004 lb/ton  
mercury: 0.00002 lb/ton  
fluoride: 0.0009 lb/ton

stainless steel-  
CO: 1.3 lbs/ton  
NOx: 0.66 lb/ton  
VOC: 0.23 lb/ton  
SO2: 0.03 lb/ton  
lead: 0.0001 lb/ton  
mercury: 0.00001 lb/ton  
fluoride: 0.0004 lb/ton

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Facility ID: 0370010023 Emissions Unit ID: P902 Issuance type: Title V Draft Permit

#### B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

#### I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. Additional Terms and Conditions			
1.	None		

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#### II. Operational Restrictions

1. None

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#### III. Monitoring and/or Record Keeping Requirements

1. None

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#### IV. Reporting Requirements

1. None

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#### V. Testing Requirements

1. None

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#### VI. Miscellaneous Requirements

1. None

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Facility ID: 0370010023 Emissions Unit ID: P903 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
#9 electric arc furnace, 125-ton holding capacity, with baghouse	OAC rule 3745-17-07(A)	See A.I.2.a.
	OAC rule 3745-17-07(B)	See A.I.2.a.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-17-08	See A.I.2.g.
	OAC rule 3745-18-06(E)	See A.I.2.c
	OAC rule 3745-31-05(A) (PTI 03-7726)	16.08 lbs particulate emissions (PE)/hr [from the baghouse serving this emissions unit]  70.4 tons PE/yr [from the baghouse serving this emissions unit]]
		112.6 lbs carbon monoxide (CO)/hr [from the baghouse serving this emissions unit]
		901.1 tons CO/rolling, 12-month period (for emissions units P902 and P903, combined)
		49.2 lbs nitrogen oxidex (NOx)/hr [from the baghouse serving this emissions unit]
		394.1 tons NOx/rolling, 12-month period (for emissions units P902 and P903, combined)
		1.9 lbs sulfur dioxide (SO2)/hr [from the baghouse serving this emissions unit] 8.4 tons SO2/yr [from the baghouse serving this emissions unit]
		17.1 lbs volatile organic compounds (VOC)/hr [from the baghouse serving this emissions unit] 75.2 tons VOC/yr [from the baghouse serving this emissions unit]
		0.008 lb lead (Pb)/hr [from the baghouse serving this emissions unit] 0.04 ton Pb/yr [from the baghouse serving this emissions unit]
		0.0009 lb mercury (Hg)/hr [from the baghouse serving this emissions unit] 0.004 ton Hg/yr [from the baghouse serving this emissions unit]
	0.07 lb fluoride (F)/hr [from the baghouse serving this emissions unit] 0.32 ton Fl/Yr [from the baghouse serving this emissions unit]	
	40 CFR 60, Subpart AAa	See A.I.2.d and e.

**2. Additional Terms and Conditions**

- a. The VE limitation specified by this rule is less stringent than the limitation established pursuant to 40 CFR, Subpart AAa.
- b. The PE limitation specified by this rule is less stringent than the emission limitation established pursuant

to OAC rule 3745-31-05(A)(3).

- c. The SO<sub>2</sub> emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. The permittee shall not cause to be discharged into the atmosphere gases from the electric arc furnace (EAF) which:
  - i. exit from the baghouse and contain PE in excess of 12 milligrams (mg)/dry standard cubic meter (dscm) [0.0052 gr/dscf];
  - ii. exit from the baghouse and exhibit 3 percent opacity or greater, as a 6-minute average; and
  - iii. exit from the shop [the building housing one or more EAFs and/or argon-oxygen decarbonization (AOD) vessels] and, due solely to the operations of any affected EAF or AOD vessel(s), exhibit 6 percent opacity or greater, as a 6-minute average.
- e. The permittee shall not cause to be discharged into the atmosphere from the dust handling system any gases which exhibit 10 percent opacity or greater, as a 6-minute average.
- f. The permittee shall not cause to be discharged fugitive PE from the melt shop and dust silos attributed to the EAFs (emissions units P902 and P903, combined) in excess of 19.8 tons per year.
- g. The RACM requirements specified by this rule are less stringent than the control measures/requirements established pursuant to 40 CFR 60, Subpart AAa.

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#### II. Operational Restrictions

1. The maximum pressure in the free space inside the EAF and the control system's fan motor amperes range, when the EAF is operating in the meltdown and refining periods, shall not exceed the following:
  - a. static pressure : + 0.0981inch of water; and
  - b. fan motor amperes ranges:
    - i. #1 fan (amps): 173 to 265;
    - ii. #2 fan (amps): 157 to 265; and
    - iii. #3 fan (amps): 164 to 261.

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#### III. Monitoring and/or Record Keeping Requirements

1. In lieu of installing a continuous monitoring system for measurement of opacity, observations of the opacity of the visible emissions (VEs) from the baghouses shall be performed by a certified VE observer as follows:
  - a. The VE observations from the baghouse serving this emissions unit shall be conducted in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
  - b. The VE observations shall be conducted at least once per day when one or more of the furnaces (emissions units P902, P903 and P904) are operating in the melting and refining period.
  - c. The VEs shall be taken for at least three 6-minute periods. The opacities shall be recorded for any point (s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6-minute observations shall be required. In this case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause or location of visible emissions observed during a single incident.
  - d. The permittee shall maintain copies of all daily opacity observations required above. The records shall identify the persons responsible for conducting the readings and verify that their Method 9 certifications are up-to-date.
2. The permittee shall check and record on a once-per-shift basis the furnace static pressure, in inches of water, and either: check and record the control system fan motor amperes and damper positions on a once-per-shift basis; install, calibrate, operate and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and check and record damper positions on a once-per-shift basis. The monitoring devices may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result. The flow rate monitoring devices shall have an accuracy of +/-10 percent over its normal operating range and shall be calibrated according to the manufacturer's instructions. The permittee may be required to demonstrate the accuracy of the monitoring devices relative to Methods 1 and 2 of appendix A of 40 CFR Part 60.
3. When the permittee is required to demonstrate compliance with the VE limitation in section A.I.2.d.iii. and at

any other time, the Director (the appropriate Ohio EPA District Office or local air agency) may require that either the control system fan motor amperes and all damper positions, or the volumetric flow rate through each separately ducted hood, or the volumetric flow rate at the control device inlet and all damper positions shall be determined during all periods in which a hood is operated for the purpose of capturing emissions.

The permittee may petition the Director for reestablishment of these parameters whenever the permittee can demonstrate to the Administrator's satisfaction that the affected facility operating conditions upon which the parameters were previously established are no longer applicable. The values of these parameters as determined during the most recent demonstration of compliance shall be maintained at the appropriate levels for each applicable period. Operation at other than baseline values will be considered by the Director (the appropriate Ohio EPA District Office or local air agency) to be unacceptable operation and maintenance of the control system.

4. The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture systems (i.e., pressure sensors, dampers, and damper switches). These inspections shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion). Any deficiencies shall be recorded and proper maintenance performed. The permittee may petition the Director (the appropriate Ohio EPA District Office or local air agency) to approve any alternative to monthly operational status inspections that will provide a continuous record of the operation of each emission capture system.
5. The permittee shall calibrate, operate and maintain monitoring devices that allow the pressure in the free space inside the EAF to be monitored. The monitoring devices may be installed in any appropriate location in the EAF's ducts prior to the introduction of ambient air such that reproducible results will be obtained. The pressure monitoring devices shall have an accuracy of +/-5 mm of water gauge over their normal operating range and shall be calibrated according to the manufacturer's instructions.
6. Except as provided for in section A.III.7, when the permittee of an EAF controlled by a direct-shell evacuation control (DEC) system is required to demonstrate compliance with the VE limitation in section A.I.2.d.iii, and at any other time the Director (the appropriate Ohio EPA District Office or local air agency) may require, the pressure in the free space inside the furnace shall be determined during the meltdown and refining period (s) using the monitoring device required pursuant to section A.III.5 above. The permittee may petition the Director (the appropriate Ohio EPA District Office or local air agency) for reestablishment of the pressure whenever the permittee can demonstrate to the the Director's (the appropriate Ohio EPA District Office's or local air agency's) satisfaction that the EAF operating conditions upon which the pressures were previously established are no longer applicable. The pressure determined during the most recent demonstration of compliance shall be maintained at all times when the EAF is operating in a meltdown and refining period. Operation at higher pressures may be considered by the Director (the appropriate Ohio EPA District Office or local air agency) to be unacceptable operation and maintenance of the affected facility.

Based upon the most recent demonstration of compliance, both the maximum pressure (i.e., the pressure shall not be any more positive) in the free space inside the EAF and the control systems fan motor amperes range, when the EAF was operating in the meltdown and refining periods, are identified below:

- a. static pressure : + 0.0981inch of water; and
- b. fan motor amperes ranges:
  - i. #1 fan (amps): 173 to 265;
  - ii. #2 fan (amps): 157 to 265; and
  - iii. #3 fan (amps): 164 to 261.
7. A furnace static pressure monitoring device is not required on any EAF equipped with a DEC system if observations of shop opacity are performed by a certified visible emission observer as follows: Shop opacity observations shall be conducted at least once per day when the furnace is operating in the meltdown and refining period. Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop taken in accordance with Method 9. Shop opacity shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one observation of shop opacity will be required. In this case, the shop opacity observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.
 

The permittee shall maintain daily records of all shop opacity observations.
8. The permittee shall calculate and maintain each month the following information for emissions units P902 and P903, combined.
  - a. the number of melts that occurred;
  - b. the type of steel produced in each melt (carbon and/or stainless steel);
  - c. the tons of steel produced in each melt;
  - d. the total tons of each type of steel produced;
  - e. the total CO emissions, in tons, calculated as follows:
    - i. for stainless steel, multiply the amount of stainless steel produced, in tons (from section 8.d.) by the emission factor of 1.3 lbs CO/ton of steel produced\*, and then divide by 2000;
    - ii. for carbon steel, multiply the amount of carbon steel produced, in tons (from section 8.d.) by the emission factor of 1.7 lbs CO/ton of steel produced\*, and then divide by 2000; and

- iii. add e.i. + e.ii.
  - \* based upon the results of the most recent emission testing conducted for this emissions unit
  - f. the total NOx emissions, in tons, calculated as follows:
- i. for stainless steel, multiply the amount of stainless steel produced, in tons (from section 8.d.) by the emission factor of 0.66 lb NOx/ton of steel produced\*, and then divide by 2000;
- ii. for carbon steel, multiply the amount of carbon steel produced, in tons (from section 8.d.) by the emission factor of 0.43 lb NOx/ton of steel produced\*, and then divide by 2000; and
- iii. add f.i. + f.ii.
  - \* based on the results of the most recent emission testing conducted for this emissions unit
  - g. the rolling, 12 month summation of the monthly CO emission rates, in tons; and
  - h. the rolling, 12-month summation of the monthly NOx emission rates; in tons.

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#### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which the opacity limitation for the baghouse was exceeded and (b) describe any corrective actions taken to eliminate the opacity exceedances. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all periods of time during which the static pressures in the free space inside the furnace exceeded the values in section A.II.1 of this permit;
  - b. all periods of time during which any of the control system fan motor ampere values were outside the ranges in section A.II.1 of this permit; and
  - c. all periods of time during which the hoods and/or the baghouse were operated at volumetric flow rates lower than those established in section A.III.3 of this permit.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the shop opacity observations were in excess of the limit specified in section A.I.2.d.iii of this permit.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the limitations (for emissions units P902 and P903, combined) of 901.1 tons of CO/rolling, 12-month period and 394.1 tons of NOx/rolling, 12-month period.
5. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

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#### V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for Hg, CO, PE, NOx and VOC. The permittee shall be deemed to be in compliance with the 12.3 lbs PE/hr and 0.0052 grain PE/dscf limitations for this emissions unit and the hourly and/or grain loading PE limitations for the other emissions units (i.e., P904 and P924) vented to this baghouse only if the testing pursuant to this term and condition shows a PE grain loading not exceeding 0.0052 grain per dry standard cubic foot of exhaust gases.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates:
    - i. Hg: Method 29 of 40 CFR, Part 60, Appendix A;
    - ii. PE: Method 5D of 40 CFR, Part 60, Appendix A;
    - iii. NOx: Method 7 of 40 CFR Part, 60, Appendix A;
    - iv. CO: Method 10 of 40 CFR, Part 60, Appendix A; and
    - v. VOC: Methods 18, 25, or 25A of 40 CFR, Part 60, Appendix A.
  - d. The test(s) for PE shall be conducted while emissions units P903, P904 and P924 are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
  - e. The tests for Hg, NOx, CO and VOC shall be conducted while this emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office

or local air agency. The tests may be conducted on the gas stream exiting this emissions unit or at the inlet to the baghouse before it combines with the gas streams from the other emissions unit.

\* Testing for Hg emissions shall be performed while melting the maximum amount possible of no. 2 bundles and frag scrap.

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

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. The written report described in section A.V.1. above, for the results of the PE testing, shall also include the following information:
  - a. facility name and address;
  - b. plant representative;
  - c. make and model of process, control device, and continuous monitoring equipment;
  - d. flow diagram of process and emission capture equipment including other equipment or process(es) ducted to the same control device;
  - e. rated (design) capacity of process equipment;
  - f. list of charge and tap weights and materials;
  - g. heat times, including start and stop times and a log of process operation, including periods of no operation during testing and the pressure inside the EAF's direct shell evacuation control system;
  - h. control device operating log;
  - i. reference Method 9 data;
  - j. test dates and test times;
  - k. test company;
  - l. test company representative;
  - m. test observers from outside agency;
  - n. description of test methodology used, including any deviation from standard reference methods;
  - o. schematic of sampling location;
  - p. number of sampling points;
  - q. description of sampling equipment;
  - r. listing of sampling equipment calibrations and procedures;
  - s. field and laboratory data sheets;
  - t. description of sample recovery procedures;
  - u. sampling equipment leak check results;
  - v. description of quality assurance procedures;
  - w. notation of sample blank corrections; and
  - x. sample emission calculations.
  
3. During the emission testing required in section A.V.1., the permittee shall also perform the following:
  - a. not add gaseous diluents to the effluent gas stream after the fabric in any pressurized fabric filter collector, unless the amount of dilution is separately determined and considered in the determination of emissions;
  - b. obtain and record the information required in sections A.III.3, A.III.6 and A.III.7; and
  - c. record the following information for all heats covered by the emission testing:
    - i. the charge weights and materials, and tap weights and materials; and
    - ii. the heat times, including start and stop times, and a log of process operation, including periods of no operation during testing and the pressure inside during testing and the pressure inside during testing and the pressure inside.
  
4. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitations:  
16.08 lbs of PE/hr and 70.4 tons of PE/yr  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of the terms and conditions of this permit.  
  
Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- b. Emission Limitation:  
901.1 tons CO/rolling, 12-month period (for emissions units P902 and P903, combined)
- Applicable Compliance Method:  
The permittee shall demonstrate compliance with the emission limitation above through the record keeping requirements specified in section A.III.8 of this permit.
- c. Emission Limitation:  
394.1 tons NOx/rolling, 12-month period (for emissions units P902 and P903, combined)
- Applicable Compliance Method:  
The permittee shall demonstrate compliance with the annual emission limitation above through the record keeping requirements specified in section A.III.8 of this permit.
- d. Emission Limitation:  
19.8 tons fugitive PE/yr
- Applicable Compliance Method:  
The permittee may determine compliance with the annual fugitive PE limitation as follows:
- multiply the maximum annual production rate (tons/yr) by the emission factor of 1.4 lbs fugitive PE/ton [for charging, tapping and slagging, from AP-42, Table 7.5-1(revised 10/86)], and then multiply by a control factor of (1-.98)\*;
  - multiply the maximum annual production rate (tons/yr) by an emission factor of 0.12 lb fugitive PE/ton [for Metallic Mineral Processing, Material Handling and Transfer, from AP-42, Table 8.23-1(revised 8/82)], and then multiply by a control factor of (1-0.9)\*\*; and
  - add d.i + d.ii.
- \* The capture efficiency supplied by the company is estimated to be 98%.
- \*\* The capture efficiency supplied by the company is estimated to be 90%.
- e. Emission Limitation:  
49.2 lbs of NOx/hr
- Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Method 7.
- f. Emission Limitations:  
1.9 lbs of SO2/hr and 8.4 tons of SO2/yr
- Applicable Compliance Method:  
The permittee may demonstrate compliance with the hourly emission limitation above by multiplying the maximum process weight rate (51.8 tons/hr) by the appropriate emission factor from section A.VI.1 of this permit.
- If required, the permittee shall demonstrate compliance with the hourly SO2 emission limitation in accordance with 40 CFR, Part 60, Appendix A, Method 6.
- Compliance with annual emission limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).
- g. Emission Limitations:  
17.1 lbs of VOC/hr and 75.2 tons of VOC/yr
- Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 18, 25 or 25A.
- Compliance with annual emission limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly emission limitation by 8760 and then dividing by 2000).
- h. Emission Limitations:  
0.008 lb of Pb/hr and 0.04 ton of Pb/yr
- Applicable Compliance Method:  
The permittee may determine compliance with the hourly emission limitation above by multiplying the maximum process weight rate (51.8 tons/hr) by the appropriate emission factor from section A.VI.1 of this permit.
- If required, the permittee shall demonstrate compliance with the hourly Pb emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 29.
- Compliance with annual emission limitation shall be assumed as long as compliance with the hourly

limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

- i. Emission Limitations:  
0.0009 lb of Hg/hr and 0.004 ton of Hg/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of the terms and conditions of this permit.

Compliance with annual emission limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

- j. Emission Limitations:  
0.07 lb of F/hr and 0.32 ton of F/yr

Applicable Compliance Method:

The permittee may determine compliance with the hourly emission limitation above by multiplying the maximum process weight rate (51.8 tons/hr) by the appropriate emission factor identified in section A.VI.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly FI emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 13.

Compliance with annual emission limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

- k. Emission Limitation:  
12 mg/dscm (0.0052 gr/dscf) from the baghouse

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

- l. Emission Limitation:  
3 percent opacity, as a 6-minute average (from the baghouse)

Applicable Compliance Method:

If required, the permittee shall determine compliance with the opacity restriction above in accordance with 40 CFR, Part 60, Appendix A, Method 9.

- m. Emission Limitation:  
6 percent opacity, as a 6-minute average (from a shop and, due solely to the operations of any affected EAF vessel(s))

Applicable Compliance Method:

If required, the permittee shall determine compliance with the opacity restriction above in accordance with 40 CFR, Part 60, Appendix A, Method 9.

- n. Emission Limitation:  
10 percent opacity, as a 6-minute average (from the dust handling system)

Applicable Compliance Method:

If required, the permittee shall determine compliance with the opacity restriction above in accordance with 40 CFR, Part 60, Appendix A, Method 9.

- o. Emission Limitation:  
112.6 lbs of CO/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Method 10. The permittee may also demonstrate compliance with the hourly emission limitation above by multiplying the maximum process weight rate (51.8 tons/hr) by the appropriate emission factor from section A.VI.1 of this permit.

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VI. **Miscellaneous Requirements**

1. The following emission factors were derived from the results of emission testing conducted at this facility, from 1995 through 1997, during the production of both carbon and stainless steel. These emission factors are based on the highest emission rate obtained for each pollutant during testing for both carbon and stainless steel (the emission factors below shall continually be updated based on the results of the most recent

emission testing that demonstrated the emissions unit was in compliance):

carbon steel -  
 CO: 1.7 lbs/ton  
 NOx: 0.43 lb/ton  
 VOC: 0.16 lb/ton  
 SO2: 0.009 lb/ton  
 lead: 0.00004 lb/ton  
 mercury: 0.00002 lb/ton  
 fluoride: 0.0009 lb/ton

stainless steel-  
 CO: 1.3 lbs/ton  
 NOx: 0.66 lb/ton  
 VOC: 0.23 lb/ton  
 SO2: 0.03 lb/ton  
 lead: 0.0001 lb/ton  
 mercury: 0.00001 lb/ton  
 fluoride: 0.0004 lb/ton

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Facility ID: 0370010023 Emissions Unit ID: P903 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2.	<b>Additional Terms and Conditions</b>		
1.	None		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0370010023 Emissions Unit ID: P904 Issuance type: Title V Draft Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
ladle metallurgical furnace, with baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08	See A.I.2.a.
	OAC rule 3745-17-07(B)(1)	Visible PE shall not exceed 20% opacity, as a 3-minute average, except as provided by the rule.
	OAC rule 3745-31-05(3) (PTI 03-7519)	0.48 lb of PE/hr [from the baghouse serving this emissions unit]
		2.10 tons per year of PE [from the baghouse serving this emissions unit]
		0.36 lb/hr of PM10 [from the baghouse serving this emissions unit]
		1.5 tons per year of PM10 [from the baghouse serving this emissions unit]
		The requirements of this rule also include the requirements of OAC rules 3745-17-07(A), 3745-17-07(B)(1) and 3745-17-08.

**2. Additional Terms and Conditions**

- a. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the use of localized hooding over the emissions unit, and venting of the particulate emissions to the baghouse.
- (a) The collection efficiency of the localized hooding shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.  
  
The baghouse employed shall achieve an outlet emission rate of not greater than 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases. The baghouse controlling this emissions unit also serves as control equipment for emissions units P903 and P924 and is subject to an outlet grain loading limitation of 0.0052 gr/dscf and an opacity limitation of 3%, pursuant to 40 CFR, Part 60, Subpart AAA.

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall conduct visible emissions (VE) observations for the baghouse serving this emissions unit in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
2. The VE observations shall be conducted at least once per day when one or more of the furnaces (emissions units P902, P903 and P904) are operating in the melting and refining period.
3. The VEs shall be taken for at least three 6-minute periods. The opacities shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6-minute observations shall be required. In this case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause or location of visible emissions observed during a single incident.
4. The permittee shall maintain copies of all daily opacity observations required above. The records shall identify the persons responsible for conducting the readings and verify that their Method 9 certifications are up-to-date.
5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any building openings housing this emissions unit. These building openings shall include, but not limited to, doorways, windows, and roof monitors. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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IV. **Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which the opacity limitation for the baghouse was exceeded and (b) describe any corrective actions taken to eliminate the opacity exceedances. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive particulate emissions were observed from any building openings housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
20 percent opacity, as a six-minute average, except as provided by rule  
  
Applicable Compliance Method:  
If required, compliance with the VE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitations:  
0.48 lb of PE/hr and 2.10 tons per year of PE [from the baghouse stack serving this emissions unit]  
  
Applicable Compliance Method:  
The permittee shall be deemed to be in compliance with the hourly limitation for this emissions unit if the results of the emission testing conducted in accordance with the methods and procedures outlined in section V.1 of the terms and conditions of the permit for emissions unit P903 shows a PE grain loading not exceeding 0.0052 grain per dry standard cubic foot of exhaust gases.  
  
If required, the permittee shall demonstrate compliance with the hourly limitation in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.  
  
Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly

emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).

- c. Emission Limitations:  
0.36 lb of PM10/hr and 1.5 tons per year of PM10 [from the baghouse stack serving this emissions unit]  
  
Applicable Compliance Method:  
The permittee shall be deemed to be in compliance with the hourly limitation for this emissions unit if the results of the emission testing conducted in accordance with the methods and procedures outlined in section V.1 of the terms and conditions of the permit for emissions unit P903 shows a PE grain loading not exceeding 0.0052 grain per dry standard cubic foot of exhaust gases.  
  
If required, the permittee shall demonstrate compliance with the hourly limitation in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A (including back half and size distribution) or Methods 201 or 201A.  
  
Compliance with the annual emission limitation shall be assumed as long as compliance with the hourly emission limitation is maintained (the annual emission limitation was calculated by multiplying the hourly emission limitation by 8760 and dividing by 2000).
- d. Emission Limitation:  
20 percent opacity, as a three-minute average, except as provided by rule  
  
Applicable Compliance Method:  
If required, compliance with the VE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(3).
- e. Emission Limitation:  
0.0052 gr/dscf (from the baghouse)  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of the terms and conditions of the permit for emissions unit P903.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0370010023 Emissions Unit ID: P904 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. <b>Additional Terms and Conditions</b>		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 0370010023 Emissions Unit ID: P924 Issuance type: Title V Draft Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
argon oxygen decarbonization vessel and preheater, with baghouse	OAC rule 3745-17-11	50.0 lbs particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
		See A.I.2.a.
	OAC rule 3745-17-08	Visible PE from any fugitive dust source shall not exceed 20% opacity, as a 3-minute average, except as provided by the rule.
	OAC rule 3745-17-07(B)	

2. **Additional Terms and Conditions**

- a. The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the use of localized hooding over the emissions unit, and venting of the particulate emissions to the baghouse.

(a)

The collection efficiency of the localized hooding shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good

engineering design.

The control equipment employed shall achieve an outlet emission rate of not greater than 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases. The baghouse controlling this emissions unit also serves as control equipment for emissions units P903 and P904 and is subject to an outlet grain loading limitation of 0.0052 gr/dscf and an opacity limitation of 3%, pursuant to 40 CFR, Part 60, Subpart AAa.

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall conduct visible emission (VE) observations for the baghouse serving this emissions unit in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
2. The VE observations shall be conducted at least once per day when one or more of the furnaces (emissions units P902, P903 and P904) are operating in the melting and refining period.
3. The VEs shall be taken for at least three 6-minute periods. The opacities shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6-minute observations shall be required. In this case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause or location of visible emissions observed during a single incident.
4. The permittee shall maintain copies of all daily opacity observations required above. The records shall identify the persons responsible for conducting the readings and verify that their Method 9 certifications are up-to-date.
5. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any building openings housing this emissions unit. These building openings shall include, but not limited to, doorways, windows, and roof monitors. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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**IV. Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which the opacity limitation for the baghouse was exceeded and (b) describe any corrective actions taken to eliminate the opacity exceedances. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible fugitive particulate emissions were observed from any building openings housing this emissions unit and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
50.0 lbs of PE/hr  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the hourly emission limitation above based upon the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of the terms and conditions of the permit for emissions unit P903.  
  
If required, the permittee shall demonstrate compliance with the hourly limitation in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:  
20 percent opacity, as a six-minute average, except as provided by rule  
  
Applicable Compliance Method:  
If required, compliance with the VE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).
- c. Emission Limitation:  
20 percent opacity, as a three-minute average, except as provided by rule  
  
Applicable Compliance Method:  
If required, compliance with the VE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(3).
- d. Emission Limitation:  
0.0052 gr/dscf (from the baghouse)  
  
Applicable Compliance Method:  
The permittee shall demonstrate compliance with the emission limitation above based upon the results of emission testing conducted in accordance with the methods and procedures outlined in section V.1 of the terms and conditions of the permit for emissions unit P903.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0370010023 Emissions Unit ID: P924 Issuance type: Title V Draft Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None