



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

3/28/2013

Certified Mail

Mr. Trevor Beers  
Nucor Steel Marion, Inc.  
912 Cheney Avenue  
Marion, OH 43301-1801

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0351010017  
Permit Number: P0110974  
Permit Type: Administrative Modification  
County: Marion

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)3528461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-NWDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Nucor Steel Marion, Inc.**

Facility ID:	0351010017
Permit Number:	P0110974
Permit Type:	Administrative Modification
Issued:	3/28/2013
Effective:	3/28/2013





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Nucor Steel Marion, Inc.

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. Federally Enforceable Standard Terms and Conditions .....	4
2. Severability Clause .....	4
3. General Requirements .....	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting .....	6
6. Compliance Requirements .....	6
7. Best Available Technology .....	7
8. Air Pollution Nuisance .....	7
9. Reporting Requirements .....	7
10. Applicability .....	8
11. Construction of New Sources(s) and Authorization to Install .....	8
12. Permit-To-Operate Application .....	9
13. Construction Compliance Certification .....	9
14. Public Disclosure .....	9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations .....	10
16. Fees.....	10
17. Permit Transfers .....	10
18. Risk Management Plans .....	10
19. Title IV Provisions .....	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions .....	13
1. F003, Slag Quenching .....	14
2. F004, Drop Ball Operations.....	20
3. F005, Slag storage pile .....	25





**Final Permit-to-Install**  
Nucor Steel Marion, Inc.  
**Permit Number:** P0110974  
**Facility ID:** 0351010017  
**Effective Date:** 3/28/2013

## Authorization

Facility ID: 0351010017  
Facility Description: Steel Mill  
Application Number(s): A0045560  
Permit Number: P0110974  
Permit Description: Material handling operations associated with slag quenching, slag storage, and drop balling.  
Permit Type: Administrative Modification  
Permit Fee: \$1,200.00  
Issue Date: 3/28/2013  
Effective Date: 3/28/2013

This document constitutes issuance to:

Nucor Steel Marion, Inc.  
912 Cheney Avenue  
Marion, OH 43301-1801

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally  
Director



**Final Permit-to-Install**  
Nucor Steel Marion, Inc.  
**Permit Number:** P0110974  
**Facility ID:** 0351010017  
**Effective Date:** 3/28/2013

## Authorization (continued)

Permit Number: P0110974  
Permit Description: Material handling operations associated with slag quenching, slag storage, and drop balling.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	Slag Quenching
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F004</b>
Company Equipment ID:	Drop Ball Operations
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F005</b>
Company Equipment ID:	Slag storage pile
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
Nucor Steel Marion, Inc.  
**Permit Number:** P0110974  
**Facility ID:** 0351010017  
**Effective Date:** 3/28/2013

## **A. Standard Terms and Conditions**



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



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

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



**Final Permit-to-Install**  
Nucor Steel Marion, Inc.  
**Permit Number:** P0110974  
**Facility ID:** 0351010017  
**Effective Date:** 3/28/2013

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install**  
Nucor Steel Marion, Inc.  
**Permit Number:** P0110974  
**Facility ID:** 0351010017  
**Effective Date:** 3/28/2013

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.



**Final Permit-to-Install**  
Nucor Steel Marion, Inc.  
**Permit Number:** P0110974  
**Facility ID:** 0351010017  
**Effective Date:** 3/28/2013

## **C. Emissions Unit Terms and Conditions**



**1. F003, Slag Quenching**

**Operations, Property and/or Equipment Description:**

Slag quenching with 3-sided roofed enclosure controlled with water mist.

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rules 3745-31-10 through 3745-31-20	Fugitive particulate emissions (PE): 0.01 ton per rolling, 12-month period  Fugitive particulate matter 10 microns or less in size (PM10): 0.004 ton per rolling, 12-month period  Fugitive particulate matter 2.5 microns or less in size (PM2.5): 0.0006 ton per rolling, 12-month period  Visible emissions restrictions (see b)(2)b.)  Best available control measures that are sufficient to minimize or eliminate fugitive particulate emissions (see b)(2)b.)
b.	OAC rule 3745-31-05(F)	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)e.
d.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)f.
e.	OAC rule 3745-17-07(B)	See b)(2)g.
f.	OAC rule 3745-17-08(B)	See b)(2)h.

(2) Additional Terms and Conditions

a. Emissions Unit F003 involves the following material handling operations which generate emissions of particulate matter:



- i. unloading of slag material (dug from the slag pit in the meltshop\*) into the 3-side roofed enclosure;
- ii. turning over of slag material;
- iii. removal of quenched material from enclosure.

\*It should be noted that emissions generated by operations associated from the initial dig out of slag material in the meltshop are addressed in permitting of emission unit P903.

- b. The permittee shall employ best available control technology (BACT) for this emissions unit. BACT has been determined to be the following:

Pollutant	BACT Requirements
PM2.5 PM10 PE	<u>Best available control measures:</u> 1) enhanced watering;  2) minimized drop height for material handling  10 percent (10%) opacity (as a 3-minute average) for visible fugitive particulate emissions from quenching operations.

- c. In accordance with OAC rule 3745-31-05(F), the permittee has voluntarily applied to limit particulate matter emissions beyond the BACT requirements of Prevention of Significant Deterioration (PSD) that are outlined above. The following requirements have been determined to NOT be representative of BACT due to cost-effective considerations. The voluntary limitations represent actions, as outlined in Director's Final Findings and Orders dated March 14, 2012, to minimize or eliminate any source of manganese which can potentially contribute to air quality in the Marion, Ohio area.

- i. Best possible control measures that are sufficient to minimize or eliminate fugitive particulate emissions:
  - (a) use of 3-sided roofed enclosure with water mist control;
  - (b) minimized drop height for material handling\*
- ii. Fugitive emissions of particulate matter shall not exceed the following:
  - (a) 0.005 ton PE per rolling, 12-month period;
  - (b) 0.002 ton PM10 per rolling, 12-month period;
  - (c) 0.0003 ton PM2.5 per rolling, 12-month period;



- iii. Visible emissions restriction - 5 percent (5%) opacity (as a 3-minute average) for visible fugitive particulate emissions from the three-sided roofed enclosure.

\*It should be noted that the control measure of minimized drop height is representative of BACT.

- d. The above-mentioned control measure(s) in b)(2)c. shall be employed for emissions unit F003 at all times when material is being handled.
- e. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit for PM2.5/PM10. The requirements of this rule are equivalent to the requirements established pursuant to OAC rules 3745-31-10 through 3745-31-20; therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-10 through 3745-31-20 and OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- f. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006, do not apply to the PM2.5/PM10 emissions from this air contaminant source since the potential to emit (PTE) is less than 10 tons per year taking into consideration the BACT requirements established under OAC rules 3745-31-10 through 3745-31-20.

BAT requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006 are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.





a. BACT Requirements:

i. Emission Limitations:

0.01 ton fugitive PE per rolling, 12-month period;

0.004 ton fugitive PM10 per rolling, 12-month period;

0.0006 ton fugitive PM2.5 per rolling, 12-month period

Applicable Compliance Method:

The emission limitations were established by multiplying the following predictive emission factors from AP-42 Section 13.2.4.3 (11/2006), a factor of 2 to account for the number of slag material drop operations, a maximum slag throughput of 75,000 tons per year, applying a 90% control efficiency for use of best available control measures, and dividing by 2000 lbs/ton:

PE – 0.001269 lb/ton

PM10 – 0.0006 lb/ton

PM2.5 – 0.00009 lb/ton Therefore, provided compliance is shown with the requirements associated with Best Available Control Measures, compliance with the rolling, 12-month period limitation shall be demonstrated. The above limitations represent BACT requirements in accordance with OAC rules 3745-31-10 through 3745-31-20. The restrictions established under OAC rule 3745-31-05(F) as required in this permit are more stringent. Therefore compliance with the requirements of OAC rules 3745-31-05(F) shall demonstrate compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20.

ii. Emission Limitation:

10 percent (10%) opacity (as a 3-minute average) for visible fugitive particulate emissions from quenching operations.

Applicable Compliance Method:

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources") and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

b. Requirements under OAC rule 3745-31-05(F):

i. Emission Limitations:

0.005 ton fugitive PE per rolling, 12-month period;



0.002 ton fugitive PM10 per rolling, 12-month period;

0.0003 ton fugitive PM2.5 per rolling, 12-month period

Applicable Compliance Method:

The emission limitations were established by multiplying the following predictive emission factors from AP-42 Section 13.2.4.3 (11/2006), a factor of 2 to account for the number of slag material drop operations, a maximum slag throughput of 75,000 tons per year, applying a 95% control efficiency for use of best possible control measures, and dividing by 2000 lbs/ton:

PE – 0.001269 lb/ton

PM10 – 0.0006 lb/ton

PM2.5 – 0.00009 lb/ton

Therefore, provided compliance is shown with the requirements associated with best possible control measures, compliance with the rolling, 12-month period limitation shall be demonstrated.

ii. Emission Limitation:

5 percent (5%) opacity (as a 3-minute average) for visible fugitive particulate emissions from the three-sided roofed enclosure.

Applicable Compliance Method:

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources") and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

(1) None.



**2. F004, Drop Ball Operations**

**Operations, Property and/or Equipment Description:**

Drop balling and associated material handling operations

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rules 3745-31-10 through 3745-31-20	Fugitive particulate emissions (PE): 0.0062 ton per rolling, 12-month period  Fugitive particulate matter 10 microns or less in size (PM10): 0.0024 ton per rolling, 12-month period  Fugitive particulate matter 2.5 microns or less in size (PM2.5): 0.0017 per rolling, 12-month period  Visible particulate emissions (PE) from drop balling and associated material processing/handling operations shall not exceed ten percent opacity as a three-minute average.  Best available control measures that are sufficient to minimize or eliminate fugitive particulate emissions (see b)(2)b.)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
d.	OAC rule 3745-17-07(B)	See b)(2)e.
e.	OAC rule 3745-17-08(B)	See b)(2)f.



(2) Additional Terms and Conditions

- a. Emissions Unit F004 involves the following processing/material handling operations which generate emissions of particulate matter:
  - i. unloading of steel pit scrap and residue material (removed from meltshop\*) to drop ball area;
  - ii. drop balling of steel pit scrap and residue material; and
  - iii. loading of drop balled material to transport equipment for return to meltshop operations.

\*It should be noted that emissions generated by operations associated with the removal of the steel pit scrap and residue material from the meltshop are addressed in permitting of emission unit P903.

- b. The permittee shall employ best available control technology (BACT) for this emissions unit. BACT has been determined to be the following:

Pollutant	BACT Requirements
PM2.5 PM10 PE	<u>Best available control measures:</u> 1) use of watering as needed to ensure compliance; 2) minimized drop height(s) 10 percent (10%) opacity (as a 3-minute average) for visible fugitive particulate emissions from drop balling and associated material processing/handling operations

- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit for PM2.5/PM10. The requirements of this rule are equivalent to the requirements established pursuant to OAC rules 3745-31-10 through 3745-31-20; therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.



It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-10 through 3745-31-20 will remain applicable after the above SIP revisions are approved by U.S. EPA.

- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006, do not apply to the PM<sub>2.5</sub>/PM<sub>10</sub> emissions from this air contaminant source since the potential to emit (PTE) is less than 10 tons per year taking into consideration the BACT requirements established under OAC rules 3745-31-10 through 3745-31-20.

BAT requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006 are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

- e. This emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), the emissions unit is exempt from the requirements of OAC rule 3745-17-08.
- f. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) 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 the following drop balling operations:
  - a. unloading of steel pit scrap and residue material to drop ball area;
  - b. drop balling of steel pit scrap and residue material; and
  - c. loading of drop balled material to transport equipment for return to meltshop operations.

The presence or absence of any visible fugitive particulate emissions for each drop ball operation above shall be noted in an operations log. If visible fugitive particulate emissions are observed, the permittee shall also note the following in the operations log:



- b. the location and color of the emissions;
- c. whether the emissions are representative of normal operations;
- d. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- e. the total duration of any visible emissions incident; and
- f. any corrective actions taken to minimize or eliminate the visible emissions.

If visible fugitive particulate emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item d)(1)g. above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that:
  - a. all days during which any visible fugitive particulate emissions were observed from the drop balling operations; and
  - b. describe any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
  - a. Emission Limitations:
    - 0.0062 ton fugitive PE per rolling, 12-month period;
    - 0.0024 ton fugitive PM10 per rolling, 12-month period;
    - 0.0017 ton fugitive PM2.5 per rolling, 12-month period



Applicable Compliance Method:

The emission limitations were established by adding emissions generated from unloading, drop balling, and loading operations:

Emissions from unloading and loading were established by multiplying the following predictive emission factors from AP-42 Section 13.2.4.3 (11/2006), a factor of 2 to account for the number of material drop operations, a maximum material throughput of 13,000 tons per year, applying a 90% control efficiency for use of best available control measures, and dividing by 2000 lbs/ton:

PE – 0.001269 lb/ton

PM10 – 0.0006 lb/ton

PM2.5 – 0.00009 lb/ton

Emissions from drop balling were established by multiplying the following predictive emission factors from AP-42 Section 13.2.4.3 (11/2006), a maximum material throughput of 13,000 tons per year, applying a 90% control efficiency for use of best available control measures, and dividing by 2000 lbs/ton:

PE – 0.00667 lb/ton

PM10 – 0.00233 lb/ton

PM2.5 – 0.00233 lb/ton

Therefore, provided compliance is shown with the requirements associated with Best Available Control Measures, compliance with the rolling, 12-month period limitation shall be demonstrated.

b. Emission Limitation:

10 percent (10%) opacity (as a 3-minute average) for visible fugitive particulate emissions from drop balling and associated material processing/handling operations.

Applicable Compliance Method:

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources") and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.



**3. F005, Slag storage pile**

**Operations, Property and/or Equipment Description:**

Slag storage piles

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rules 3745-31-10 through 3745-31-20	Fugitive particulate emissions (PE): 0.093 ton per rolling, 12-month period  Fugitive particulate matter 10 microns or less in size (PM10): 0.047 ton per rolling, 12-month period  Fugitive particulate matter 2.5 microns or less in size (PM2.5): 0.007 ton per rolling, 12-month period  Visible emissions restrictions (see b)(2)b and b)(2)g.)  Best available control measures that are sufficient to minimize or eliminate fugitive particulate emissions (see b)(2)g.)
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
d.	OAC rule 3745-17-07(B)	See b)(2)e.
e.	OAC rule 3745-17-08(B)	See b)(2)f.

(2) Additional Terms and Conditions

a. Emissions Unit F005 involves load-in, load-out, and wind erosion emissions from storage of quenched slag material to be transported offsite.



- b. The permittee shall employ best available control technology (BACT) for this emissions unit. BACT has been determined to be the following:

Pollutant	BACT Requirements
PM2.5 PM10 PE	<u>Best available control measures:</u> 1) use of watering as needed to ensure compliance; 2) minimized drop height(s)
	<u>Visible emission restrictions:</u> 1) visible PE not to exceed 1 minute during a 60-minute period for storage pile(s) load-in and load-out (truck loading) operations 2) visible PE not to exceed 1 minute during a 60-minute period for wind erosion from the surface of storage pile(s)

- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit for PM2.5/PM10. The requirements of this rule are equivalent to the requirements established pursuant to OAC rules 3745-31-10 through 3745-31-20; therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-10 through 3745-31-20 will remain applicable after the above SIP revisions are approved by U.S. EPA.

- d. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006, do not apply to the PM2.5/PM10 emissions from this air contaminant source since the potential to emit (PTE) is



less than 10 tons per year taking into consideration the BACT requirements established under OAC rules 3745-31-10 through 3745-31-20.

BAT requirements under OAC rule 3745-31-05(A)(3), as effective December 1, 2006 are not applicable to the particulate emissions emitted from this emissions unit. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. Particulate emissions (also referred to as total suspended particulate or particulate matter) is an air contaminant that does not involve an established NAAQS.

- e. This emissions unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), the emissions unit is exempt from the requirements of OAC rule 3745-17-08.
- f. Pursuant to OAC rule 3745-17-07(B)(11)(e), OAC rule 3745-17-07(B)(1) does not apply because OAC rule 3745-17-08 is not applicable.
- g. The permittee shall employ best available control measures meeting BACT requirements for the Slag Storage Piles and associated material handling operations (emissions unit F005). Best available control measures (meeting BACT) have been determined to be the following to ensure compliance with the visible emission restrictions and emission limitations contained in this permit:

Storage Pile/Handling Operation	Control Measure	Visible Emission Restriction(s)
Load-in, load-out and wind erosion for storage pile(s) of quenched slag material prior to transfer to off-site	Minimize drop height Watering as needed	Visible PE not to exceed 1 minute during a 60-minute period for storage pile(s) load-in and load-out/truck loading operations  Visible PE not to exceed 1 minute during a 60-minute period for wind erosion from the surface of storage pile(s)

Minimizing drop height as a control measure shall be employed for all storage pile operations at all times.

- h. The control measure of watering as needed shall be employed for the storage pile activity below for each individual storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that watering is necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of watering



shall continue during any such operation until further observation confirms that use of control is unnecessary:

- i. each load-in and load-out/truck loading operation of each storage pile; and
- ii. wind erosion from each storage pile.

Implementation of watering shall not be necessary to control emissions from wind erosion for a storage pile 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.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

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

<u>storage pile identification</u>	<u>minimum load-in inspection frequency</u>
All slag piles	daily

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

<u>storage pile identification</u>	<u>minimum load-out/truck loading inspection frequency</u>
All slag piles	daily

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

<u>storage pile identification</u>	<u>minimum wind erosion inspection frequency</u>
All slag piles	daily

- (4) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the 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.

- (5) The purpose of the inspections is to ensure minimizing drop height(s) is employed and to determine the need for implementing watering for control as specified in this permit for



load-in and load-out/truck loading of a storage pile, wind erosion from the surface of a from a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

- (6) 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 minimizing drop height(s) was not employed;
  - c. the date of each inspection where it was determined by the permittee that it was necessary to implement watering for control;
  - d. the dates the watering for control was implemented; and
  - e. on a calendar quarter basis, the total number of days the watering for control was implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in d)(6)d. shall be kept separately for (i) the load-in operations, (ii) the load-out/truck loading operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation;
  - b. each instance when watering for control, that was to be implemented as a result of an inspection, was not implemented; and
  - c. each instance when minimizing drop height(s) was not implemented.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emission Limitations:

0.093 ton fugitive PE per rolling, 12-month period;

0.047 ton fugitive PM10 per rolling, 12-month period;

0.007 ton fugitive PM2.5 per rolling, 12-month period

Applicable Compliance Method:

Compliance with fugitive particulate matter limitations shall be determined by using the emission factors from AP-42 Section 13.2.4 (11/2006), for load-in operations and load-out operations, and an emission factor determined from USEPA's Control of Open Fugitive Dust Sources (9/88) for wind erosion. The emission factors were applied to a maximum throughput of 75,000 tons per year and a maximum storage surface area of 0.47 acres, and applied a 90% control efficiency associated with best available control measures. Therefore, provided compliance is shown with the requirements associated with Best Available Control Measures, compliance with the rolling, 12-month period limitation shall be demonstrated.

b. Emission Limitation:

Visible PE shall not exceed 10% opacity, as a 3-minute average for truck loading of material from storage pile(s).

Applicable Compliance Method:

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources") and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

c. Emission Limitation:

Visible PE not to exceed 1 minute during a 60-minute period for storage piles

Applicable Compliance Method:

Compliance with the visible PE limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").

g) Miscellaneous Requirements

(1) None.