State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**

MUSKINGUM COUNTY
Application No: 06-07123

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 11/18/2003

AK Steel Corporation - Zanesville Works
J. Cory Levengood
1724 Linden Ave
Zanesville, OH 437012307

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: USEPA **SEDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 11/18/2003**
Terms and Conditions **Effective Date: 11/18/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL

06-07123

Application Number: 06-07123

APS Premise Number: 0660010006

Permit Fee: **$500**

Name of Facility: AK Steel Corporation - Zanesville Works

Person to Contact: J. Cory Levengood

Address: 1724 Linden Ave
Zanesville, OH 437012307

Location of proposed air contaminant source(s) [emissions unit(s)]:
1724 Linden Ave
Zanesville, Ohio

Description of proposed emissions unit(s):
Administrative modification of PTI 06-07123, issued 5/13/03, to correct allowable CO and VOC emissions due to AP-42 emission factor revisions.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. 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:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the

previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.

iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, 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, reopening 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.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. 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.

b. 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:

i. 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.

ii. 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.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. 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.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. 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.

10. Permit To Operate Application

a. If 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

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

5. Construction of New Sources(s)

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

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

6. 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.

7. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

8. Construction Compliance Certification

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

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
PE	6.44
VOC	2.85
NO_X	193.7 (64.68 tpy decrease)
CO	43.41
HF	0.63

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P008 - No. 1 Annealing and Pickling Line vented to 2 packed tower wet scrubbers, including pickling line and anneal furnace, with hydrogen peroxide as a fume suppressant.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 1.47 lbs/hr, 6.44 tpy.
		Emissions of volatile organic compounds (VOC) shall not exceed 0.65 lb/hr, 2.85 tpy.
The requirements of PTI # 06-7123 supersede the requirements of PTI # 06-4694, issued December 28, 1995.		Emissions of nitrogen oxides (NOx) shall not exceed 44.22 lbs/hr, 193.7 tpy.
		Emissions of carbon monoxide (CO) shall not exceed 9.91 lbs/hr, 43.41 tpy.
*Modification		Emissions of hydrogen fluoride (HF) shall not exceed 0.143 lb/hr, 0.63 tpy.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-23-06(B).
		See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.b below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-18-06(E)(2)	See A.I.2.b below.
	OAC rule 3745-23-06(B)	See A.I.2.c below.

2. Additional Terms and Conditions

2.a The permittee shall employ low NOx burners, the addition of hydrogen peroxide to pickling baths, and a packed bed scrubber to reduce NOx emissions whenever this emissions unit is in operation.

2.b The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

2.c The permittee has satisfied the"latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 06-07123.

II. Operational Restrictions

1. For the acid fume scrubber (Heil Process Co.), the pressure drop across the scrubber shall be continuously maintained at a value of not less than 2 inches of water while the emissions unit is in operation.

2. For the kolene scrubber (Enviroclear), the pressure drop across the scrubber shall be continuously maintained at a value of not less than 1 inch of water while the emissions unit is in operation.

3. The permittee shall maintain the hydrogen peroxide feed rate for each product type produced in this emissions unit at an hourly rate that is not less than the hydrogen peroxide feed rate established during the most recent emission tests that demonstrated this emissions unit was in compliance with the hourly allowable NOx emission limitation of 44.22 lbs/hr.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across each scrubber while the emissions unit is in operation. The monitoring devices and any recorders 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 pressure drop across each scrubber, in inches of water; and

   b. the downtimes for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2. The permittee shall maintain monthly records of the following information:

   a. the production rate, in tons;

   b. hours of operation;

   c. the average hourly production rate, in tons/hour;

   d. the total amount of natural gas employed by the emissions unit, in mmcf; and

   e. the average hourly natural gas usage, calculated as follows:

      mmcf/hr = the total amount of natural gas employed, in mmcf / the total hours of operation.

3. The permittee shall maintain records of the following information for each run of each product type produced in this emissions unit:

   a. the total amount of hydrogen peroxide employed, in gallons;

   b. the hours of operation for the product type run; and

   c. the average hourly hydrogen peroxide feed rate, in lb H_2O_2 / hour.

4. 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 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 any visible emission incident; and

   e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the static pressure drop across each scrubber was not maintained at or above the required level.

2. The permittee shall submit quarterly deviation (excursion) reports that identify any hydrogen peroxide feed rate that did not comply with the operational restriction specified in section A.II.3.

3. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions.

4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack 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.

V. Testing Requirements

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

   a. Emission Limitation:

      Particulate emissions (PE) shall not exceed 1.47 lbs/hr.

      Applicable Compliance Method:

      Compliance shall be determined using the following calculation method, where total particulate emissions equal the summation of emissions from the natural gas annealing furnace and the pickling and kolene process:

      i. Annealing furnace particulate emissions are calculated by multiplying the emission factor from AP-42, Table 1.4-2, 7/98 (7.6 lbs/mmcf) by the annealing furnace maximum fuel usage (0.118 mmcf/hr).

      ii. Pickling and kolene particulate emissions are calculated by multiplying the stack test- derived emission factor of 0.02 lb PE/ton metal (submitted by the permittee in PTI 06-04694 application) by the maximum process weight rate of P008 (28.7 ton metal/hr).

      iii. Total allowable emissions = 0.90 lb/hr + 0.57 lb/hr = 1.47 lbs PE/hr

      If required, compliance shall also be determined in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

   b. Emission Limitation:

      Particulate emissions (PE) shall not exceed 6.44 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the annual hours of operation, and then dividing by 2000 lbs/ton.

c. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 0.65 lb/hr.

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor from AP-42, Table 1.4-2, 7/98 (5.5 lbs VOC/mmcf) by the annealing furnace maximum fuel usage (0.118 mmcf/hr).

If required, compliance shall also be determined in accordance with 40 CFR Part 60, Appendix A, Method 25. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

d. Emission Limitation:

Emissions of volatile organic compounds (VOC) shall not exceed 2.85 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the annual hours of operation, and then dividing by 2000 lbs/ton.

e. Emission Limitation:

Emissions of nitrogen oxides (NOx) shall not exceed 44.22 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.2. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

f. Emission Limitation:

Emissions of nitrogen oxides (NOx) shall not exceed 193.7 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the annual hours of operation, and then dividing by 2000 lbs/ton.

g. Emission Limitation:

Emissions of carbon monoxide (CO) shall not exceed 9.91 lbs/hr

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor from AP-42, Table 1.4-1, 7/98 (84 lbs CO/mmcf) by the annealing furnace maximum fuel usage (0.118 mmcf/hr).

If required, compliance shall also be determined in accordance with 40 CFR Part 60, Appendix A, Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

h. Emission Limitation:

Emissions of carbon monoxide (CO) shall not exceed 43.41 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the annual hours of operation, and then dividing by 2000 lbs/ton.

i. Emission Limitation:

Emissions of hydrogen fluoride (HF) shall not exceed 0.143 lb/hr.

Applicable Compliance Method:

Compliance with the above emission limit was last demonstrated by a stack test conducted by the facility on September 13, 1995, resulting in HF emissions of 0.143 lb/hr.

If required, compliance shall also be determined in accordance with 40 CFR Part 60, Appendix A, Method 26A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.

j. Emission Limitation:

Emissions of hydrogen fluoride (HF) shall not exceed 0.63 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the annual hours of operation, and then dividing by 2000 lbs/ton.

k. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in Test Method 9 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.

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 6 months after issuance of this permit and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to establish the hydrogen peroxide feed rate necessary to maintain compliance with the NOx emission limitation during the production of each type of product and to demonstrate compliance with the allowable mass emission rate for NOx.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for NOx, Method 7 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the 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.

e. The permittee shall record the total amount of hydrogen peroxide employed and the average hourly hydrogen peroxide feed rate during each emission test run for each type of product produced.

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. As new product types are developed for production in this emissions unit, the permittee shall conduct emission tests for each new product type in accordance with the procedure specified in section A.V.2. Such emission tests shall be performed before routine production of the new product type begins.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P008 - No. 1 Annealing and Pickling Line vented to 2 packed tower wet scrubbers, including pickling line and anneal furnace , with hydrogen peroxide as a fume suppressant.	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None