State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

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

10/05/07

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

02-47-08-0961
Lorain Tubular Company LLC
John W Bilz
2199 E. 28th Street
Lorain, OH 44055

Dear John W Bilz:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

Andrew Hall
Permit Review/Development Section
Ohio EPA, Division of Air Pollution Control
122 South Front Street
Columbus, Ohio 43215

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Northeast District Office.

Sincerely,

Michael W. Ahern

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

cc: USEPA (electronically submitted)
File, DAPC PIER
Northeast District Office

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 10/05/07	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 02-47-08-0961 to:

Lorain Tubular Company LLC
2199 E. 28th Street
Lorain, OH 44055

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

F001 (Roadways & Parking Lots)
Paved & Aggregate Roadways and Parking Lots

F003 (No. 3 Seamless Mill Reeling Machine)
Reeler Unit (formerly emission unit ID Z005)

K003 (No. 3 Seamless Mill No. 3 Pipe Coater)
Pipe Coater

K005 (No. 4 Seamless Mill No. 5 Pipe Coater)
Pipe Coater

K006 (No. 4 Seamless Mill No. 6 Pipe Coater)
Pipe Coater

P002 (No. 3 Smls Q & T Austenitizing Furnace)
Reheat Furnace

P003 (No. 3 Smls Q & T Tempering Furnace)
Reheat Furnace

P035 (No. 3 Seamless Mill Rotary Furnace)
Rotary Furnace

P036 (No. 3 Seamless Mill No. 1 Reheat Furnace)
Reheat Furnace

P037 (No. 3 Seamless Mill No. 2 Reheat Furnace)
Reheat Furnace

P039 (No. 4 Seamless Mill Rotary Furnace)
Rotary Furnace

P040 (No. 4 Seamless Mill Reheat Furnace)
Reheat Furnace

P048 (No. 3 Seamless Mill Rotary Mill)
Rotary Mill

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

Ohio Environmental Protection Agency

_____

Chris Korleski
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. 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, i.e., in Section A.III of Part III of this Title V permit, 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter. (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).)

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided

in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office

or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

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.
(Authority for term: OAC rule 3745-77-07(A)(5))

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.
(Authority for term: OAC rule 3745-77-07(A)(6))

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, in accordance with A.10 below. 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.

f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

   i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

   ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

   iii. a combination of i. and ii. above.

   The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
   (Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

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.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. 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.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.

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.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed

under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. ***State Only Enforceable Section***

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. 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.

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or

b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

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

F002 - Storage Pile [OAC rule 3745-17-07(B)(8)(b), (B)(8)(d)];
F004 - Q & T Scale Storage Pile [PTI 02-15543];
G001 - Gasoline / Diesel Fuel Dispensing Station [PTI 02-17106]; and
L001 - L022 Parts Cleaners [OAC rule 3745-21-09(O)].

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed below that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

T020 - Tubular Hydraulic Oil Tank;
Z031 - No. 3 SM - Plug Mill;
Z032 - No. 4 SM - Mandrel Mill;
Z035 - No. 3 SM - # 3 North Task Stencil Unit, including Amalog East, Middle and West Marking Units;
Z036 - No. 3 SM - # 3 South Task Stencil Unit;
Z038 - No. 4 SM - # 1 Batch Saw Stencil Unit;
Z039 - No. 4 SM - # 2 Batch Saw Stencil Unit;
Z040 - No. 4 SM - # 2 Cutoff # 3 Head Stencil Unit;
Z041 - No. 4 SM - # 2 Cutoff - # 4 Head Stencil Unit;
Z042 - No. 4 SM - # 1 Stencil Unit;
Z043 - No. 4 SM - # 2 Stencil Unit;
Z044 - Scrap Burning Station;
Z045 - Manual Billet Sizing Station;
Z047 - Lagoon Oil Storage Tank;
Z053 - No. 3 SM - ICO Northeast Marking Unit;
Z054 - No. 3 SM - ICO Northwest Marking Unit;
Z055 - No. 3 SM - ICO Southeast Marking Unit;
Z056 - No. 3 SM - ICO Southwest Marking Unit;
Z057 - No. 4 SM - ICO North Marking Unit;
Z058 - No. 4 SM - ICO South Marking Unit;
Z059 - Manual Spray Painting;
Z060 - Firewater System Diesel Fuel Storage Tank;
Z061 - Firewater System Diesel Fuel Pump; and
Z063 - Ultrasonic Testing Marking Unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Roadways & Parking Lots (F001)

Activity Description: Paved & Aggregate Roadways and Parking Lots

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paved roadways and parking areas (see section A.2.a)	OAC rule 3745-17-07(B)(8)(a)	Visible particulate emissions from any paved roadways and parking areas shall not exceed 10% opacity. See section A.I.2.k.
	OAC rule 3745-17-08(B), (B)(8), (B)(9)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.c, A.I.2.d, and A.I.2.f through A.I.2.j)
unpaved roadways and parking areas (see section A.2.b)	OAC rule 3745-17-07(B)(8)(a)	Visible particulate emissions from any unpaved roadways and parking areas shall not exceed 10% opacity. See section A.I.2.k.
	OAC rule 3745-17-08(B), (B)(2)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.e through A.I.2.j)

2. Additional Terms and Conditions

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

paved roadways:	Approx. one-way mileage of road segment:
Grove St. entrance road (VT001)	0.10
Grove St. to #4 Seamless (VT002)	0.75
#4 Seamless to NW boundary access road (VT003)	0.15
NW boundary access road (VT004)	0.10
NW boundary access road to coil warehouse (VT005)	0.30
Access Road East of Coil Warehouse (VT005A)	0.10
Charleston access road to #3 Seamless East (VT007)	0.40
Charleston St. access road (VT008)	0.25
Grove St. to Charleston access road (VT009)	0.25
South plant side access road to north plant side access road (VT010)	0.40
From segment #10 to #3 Seamless east (VT011)	0.25
Gary Avenue to Grove Street Truck Gate (VT013A)	0.20
Gantry crane pipe loading (VT015)	1.20
Seamless pipe loading (VT016)	0.30
Lagoon and D2 Access Road (VT019A)	0.10
#3 Hot and Maintenance Parking (VT020)	0.10
ERW Parking (VT021)	0.10
#3 Smls Office Parking (VT029)	0.10

paved parking areas:	Approx. one-way mileage of paved parking area:
Grove St. parking lot (VT013)	0.30
Main Office parking lot (VT014)	0.10

2. Additional Terms and Conditions (continued)

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

unpaved roadways:	Approx. one-way mileage of road segment:
North plant side access road (VT006)	0.60
Charleston St. access road (VT008a)	0.05
Access road to 4 seasons trailer (VT012)	0.15
Pipe warehouse truck road (VT017)	0.10
Bar coil warehouse truck road (VT018)	0.20
Lagoon and D-2 access road (VT019)	0.25
unpaved parking areas:	Approx. one-way mileage of unpaved parking area:
#4 Office Parking (VT022)	0.10
Gantry Parking VT023:	0.10
#3 Hot and Maintenance Parking (VT024)	0.10
#3 Hot and Maintenance Parking (VT025)	0.10
#3 Finishing Parking (VT026)	0.10
D&T, TCM Parking (VT027)	0.10
#4 Finishing Parking (VT028)	0.10
#3 Smls Office Parking (VT029)	0.10

2.c The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee has committed to treat the paved roadways and parking areas by employing the different control measures mentioned in OAC rule 3745-17-08(B) at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.d The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with suitable dust suppressant chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.e The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with suitable dust suppressant chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2. Additional Terms and Conditions (continued)

2.f The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

2.g Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.

2.h The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

2.i Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.

2.j Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

2.k The emission limitation and rule citation reflect the settlement agreement reached between Ohio EPA and the iron and steel production facilities concerning the iron and steel facilities' appeal to the Ohio Environmental Review Appeals Commission of the 1991 revisions and additions to OAC Chapter 3745-17. The revised rule containing the limitation and rule citation was adopted by the Director of Ohio EPA in December, 1997. The USEPA and the iron and steel production faclities have agreed to consider the emission limitation and rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the limitation and rule citation as a revision to the Ohio SIP for particulate matter.

II. Operational Restrictions

1. Operational Restrictions Concerning the Use of Dust Suppressants

When a dust suppressant is used for controlling fugitive dust from the unpaved road segments and parking areas, the following restrictions apply:

a. The permittee shall certify or possess certification that all dust suppressants used to control fugitive dust meet the PCB limitations set forth in 40 CFR 761, and that there are no listed hazardous wastes or characteristic hazardous wastes as set forth in 40 CFR 261.

b. The permittee shall not apply used oil as defined by OAC rule 3745-279-01(A)(12) as a dust suppressant.

c. The dust suppressant shall be applied in such a manner as to prevent pollution of waters of the State as required by the Ohio Revised Code, section 6111.

III. Monitoring and/or Record Keeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

paved roadways:	minimum inspection frequency:
Grove St. entrance road (VT001)	weekly
Grove St. to #4 Seamless (VT002)	weekly
#4 Seamless to NW boundary access road (VT003)	weekly
NW boundary access road (VT004)	weekly
NW boundary access road to coil warehouse (VT005)	weekly
Access Road East of Coil Warehouse (VT005A)	weekly
Charleston access road to #3 Seamless East (VT007)	weekly
Charleston St. access road (VT008)	weekly
Grove St. to Charleston access road (VT009)	weekly
South plant side access road to north plant side access road (VT010)	weekly
From segment #10 to #3 Seamless east (VT011)	weekly
Gary Avenue to Grove Street Truck Gate (VT013A)	weekly
Gantry crane pipe loading (VT015)	weekly
Seamless pipe loading (VT016)	weekly
Lagoon and D2 Access Road (VT019A)	weekly
#3 Hot and Maintenance Parking (VT020)	weekly
ERW Parking (VT021)	weekly
#3 Smls Office Parking (VT029)	weekly

paved parking areas:	minimum inspection frequency:
Grove St. parking lot (VT013)	weekly
Main Office parking lot (VT014)	weekly

III. Monitoring and/or Record Keeping Requirements (continued)

unpaved roadways	minimum inspection frequency
North plant side access road (VT006)	weekly
Charleston St. access road (VT008a)	weekly
Access road to 4 seasons trailer (VT012)	weekly
Pipe warehouse truck road (VT017)	weekly
Bar coil warehouse truck road (VT018)	weekly
unpaved parking areas:	minimum inspection frequency
#4 Office Parking (VT022)	weekly
Gantry Parking (VT023):	weekly
#3 Hot and Maintenance Parking (VT024)	weekly
#3 Hot and Maintenance Parking (VT025)	weekly
#3 Finishing Parking (VT026)	weekly
D&T, TCM Parking (VT027)	weekly
#4 Finishing Parking (VT028)	weekly
#3 Smls Office Parking (VT029)	weekly

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented and for the paved roadways and parking areas, the types of control measures that were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in section A.III.3.d shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:

a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emissions limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

Visible particulate emissions from any paved and unpaved roadways and parking areas shall not exceed 10% opacity.

Applicable Compliance Method:

Compliance with the emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standard of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraph (B)(3)(d) of OAC rule 3745-17-03.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 3 Seamless Mill Reeling Machine (F003)

Activity Description: Reeler Unit (formerly emission unit ID Z005)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
No. 3 Seamless Mill Reeling Machines (East and West Reelers)	OAC rule 3745-17-07(B)(1)	See section A.I.2.a below.
	OAC rule 3745-17-08(B)	See section A.I.2.b below.

2. Additional Terms and Conditions

2.a Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

2.b The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:

i. effective and permanent positioning of the lubricant material spray nozzles immediately before the shell enters the reelers so as to minimize emissions from the ends of the shells; and

ii. the application of water to the shell and burnishing rolls, as the shell is being mechanically worked, to reduce the generation of iron oxide dust particulates.

Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure of water from each water spray nozzle system (East and West Reelers), in psig, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer"s recommendations, instructions, and operating manual(s). The permittee shall record the pressure of water from each spray nozzle system (East and West Reelers), in psig, on a daily basis.

Whenever the monitored value for the pressure of water deviates below the value specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable value of pressure of water from each spray nozzle system (East and West Reelers) shall be maintained at a minimum of 15 psig.

This value is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the value based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any building openings housing this emissions unit. These building openings shall include, but not limited to, doorways, windows,and roof monitors. The presence 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify any day when the water sprays were not operating while the emissions unit was in operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit water pressure deviation (excursion) reports that identify all periods of time during which the water pressure did not comply with the allowable water pressure specified above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements (continued)

3. The permittee shall submit written reports that (a) identify all days during which any visible particulate emissions were observed from any building openings housing 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emissions limitation in section A.I.2 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the No. 3 Seamless Mill Reeling Machines identified above shall be determined in accordance with 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, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 3 Seamless Mill No. 3 Pipe Coater (K003)

Activity Description: Pipe Coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
No. 3 Pipe Coating Unit (Nordson continuous coating unit)	OAC rule 3745-31-05(A)(3) (PTI 02-1974)	Volatile organic compounds (VOC) emissions shall not exceed 3.75 pounds per gallon of coating, excluding water and exempt solvents. See section A.II.1 below.
	OAC rule 3745-21-09(U)(1)(a)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 74,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-1974]

III. Monitoring and/or Record Keeping Requirements

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

a. the coating usage for each month; and

b. the rolling, 12-month summation of the coating usage, in gallons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each day of operation:

a. the name and identification number of each coating, as purchased and received;

b. the VOC content of each coating material (excluding water and exempt solvents), as purchased and received;

c. the VOC content of each solvent material;

d. the amount of each solvent material added to coating material per day;

e. the amount of each coating material used per day, excluding water and exempt solvents; and

f. the daily, volume-weighted average VOC content of the coatings, as applied, in pounds per gallon of coating, excluding water and exempt solvents (calculated in accordance with the equation in A.V.1.a).

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC sule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install No. 02-1974, issued on June 5, 1985: section A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the VOC content limitation of 3.75 pounds per gallon, based on the equation in section A.V.1.a of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions section A.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions shall not exceed 3.75 pounds per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined for each day by using the following equation:

E = [Summation of (Ai*Bi + Ci*Di) for all coating materials and solvent materials employed] / [Summation of (Ai + Ci) for all coating materials and solvent materials employed]

where:

E = VOC content of the applied coatings, in lbs per gallon, excluding water and exempt solvents;

Ai = gallons of coating material i consumed per day (prior to any solvent additions), excluding water and exempt solvents;

Bi = VOC content of coating material i as received, in lbs VOC per gallon, excluding water and exempt solvents;

Ci = gallons of solvent material i added per day;

Di = VOC content of solvent material i, in lbs VOC per gallon;

i = subscript denoting a coating material or solvent material employed (i = 1 to n); and

n = total number of coating materials and solvent materials employed per day.

Compliance shall be based upon the record keeping requirements specified in section A.III.2. USEPA Method 24 shall be used to determine the VOC content for each coating. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

The VOC content of each the solvent added to the coating material shall be determined based upon the formulation data.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 4 Seamless Mill No. 5 Pipe Coater (K005)

Activity Description: Pipe Coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
No. 5 Pipe Coating Unit (Nordson continuous coating unit)	OAC rule 3745-31-05(A)(3) (PTI 02-1975)	Volatile organic compounds (VOC) emissions shall not exceed 3.75 pounds per gallon of coating, excluding water and exempt solvents. See section A.II.1 below.
	OAC rule 3745-21-09(U)(1)(a)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 74,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-1975]

III. Monitoring and/or Record Keeping Requirements

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

a. the coating usage for each month; and

b. the rolling, 12-month summation of the coating usage, in gallons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each day of operation:

a. the name and identification number of each coating, as purchased and received;

b. the VOC content of each coating material (excluding water and exempt solvents), as purchased and received;

c. the VOC content of each solvent material;

d. the amount of each solvent material added to coating material per day;

e. the amount of each coating material used per day, excluding water and exempt solvents; and

f. the daily, volume-weighted average VOC content of the coatings, as applied, in pounds per gallon of coating, excluding water and exempt solvents (calculated in accordance with the equation in A.V.1.a).

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install No. 02-1975, issued on June 5, 1985: section A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the VOC content limitation of 3.75 pounds per gallon, based on the equation in section A.V.1.a of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions section A.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions shall not exceed 3.75 pounds per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined for each day by using the following equation:

E = [Summation of (Ai*Bi + Ci*Di) for all coating materials and solvent materials employed] / [Summation of (Ai + Ci) for all coating materials and solvent materials employed]

where:

E = VOC content of the applied coatings, in lbs per gallon, excluding water and exempt solvents;

Ai = gallons of coating material i consumed per day (prior to any solvent additions), excluding water and exempt solvents;

Bi = VOC content of coating material i as received, in lbs VOC per gallon, excluding water and exempt solvents;

Ci = gallons of solvent material i added per day;

Di = VOC content of solvent material i, in lbs VOC per gallon;

i = subscript denoting a coating material or solvent material employed (i = 1 to n); and

n = total number of coating materials and solvent materials employed per day.

Compliance shall be based upon the record keeping requirements specified in section A.III.2. USEPA Method 24 shall be used to determine the VOC content for each coating. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

The VOC content of each the solvent added to the coating material shall be determined based upon the formulation data.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 4 Seamless Mill No. 6 Pipe Coater (K006)

Activity Description: Pipe Coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
No. 6 Pipe Coating Unit (Nordson continuous coating unit)	OAC rule 3745-31-05(A)(3) (PTI 02-1976)	Volatile organic compounds (VOC) emissions shall not exceed 3.75 pounds per gallon of coating, excluding water and exempt solvents. See section A.II.1 below.
	OAC rule 3745-21-09(U)(1)(a)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 74,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-1976]

III. Monitoring and/or Record Keeping Requirements

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

a. the coating usage for each month; and

b. the rolling, 12-month summation of the coating usage, in gallons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information for each day of operation:

a. the name and identification number of each coating, as purchased and received;

b. the VOC content of each coating material (excluding water and exempt solvents), as purchased and received;

c. the VOC content of each solvent material;

d. the amount of each solvent material added to coating material per day;

e. the amount of each coating material used per day, excluding water and exempt solvents; and

f. the daily, volume-weighted average VOC content of the coatings, as applied, in pounds per gallon of coating, excluding water and exempt solvents (calculated in accordance with the equation in A.V.1.a).

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install No. 02-1976, issued on June 5, 1985: section A.IV.3. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes with the underlying reporting requirements in the Permit to Install.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month coating usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the VOC content limitation of 3.75 pounds per gallon, based on the equation in section A.V.1.a of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions section A.1.c.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC) emissions shall not exceed 3.75 pounds per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined for each day by using the following equation:

E = [Summation of (Ai*Bi + Ci*Di) for all coating materials and solvent materials employed] / [Summation of (Ai + Ci) for all coating materials and solvent materials employed]

where:

E = VOC content of the applied coatings, in lbs per gallon, excluding water and exempt solvents;

Ai = gallons of coating material i consumed per day (prior to any solvent additions), excluding water and exempt solvents;

Bi = VOC content of coating material i as received, in lbs VOC per gallon, excluding water and exempt solvents;

Ci = gallons of solvent material i added per day;

Di = VOC content of solvent material i, in lbs VOC per gallon;

i = subscript denoting a coating material or solvent material employed (i = 1 to n); and

n = total number of coating materials and solvent materials employed per day.

Compliance shall be based upon the record keeping requirements specified in section A.III.2. USEPA Method 24 shall be used to determine the VOC content for each coating. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

The VOC content of each the solvent added to the coating material shall be determined based upon the formulation data.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 3 Smls Q & T Austenitizing Furnace (P002)

Activity Description: Reheat Furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Natural gas fired Austenitizing reheat furnace, with maximum heat input capacity of 50 mmBtu per hour, for quenching and tempering	OAC rule 3745-31-05(A)(3) (PTI 02-15543)	Nitrogen oxides (NOx) emissions shall not exceed 0.072 lb/mmBtu (as measured at the maximum firing condition), 3.60 lbs/hr and 15.80 tpy. Particulate emissions (PE) shall not exceed 0.10 lb/hr and 0.44 tpy. Sulfur dioxide (SO2) emissions shall not exceed 0.03 lb/hr and 0.13 tpy. Carbon monoxide (CO) emissions shall not exceed 4.20 lbs/hr and 18.40 tpy. Organic compounds (OC) emissions shall not exceed 0.55 lb/hr and 2.41 tpy. Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.
	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-15543]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

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:

1.a Emission Limitation:

NOx emissions shall not exceed 0.072 lb/mmBtu (as measured at the maximum firing condition).

Applicable Compliance Method:

Compliance shall be demonstrated based on emission tests performed in accordance with the requirements specified in section A.V.2.

1.b Emission Limitations:

NOx emissions shall not exceed 3.60 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined by multiplying the results of the most recent compliance test (lb/mmBtu) by the maximum heat input of 50 mmBtu/hr.

1.c Emission Limitation:

NOx emissions shall not exceed 15.80 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable NOx emission limitation (3.60 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

V. Testing Requirements (continued)

1.d Emission Limitation:

PE shall not exceed 0.10 lb/hr.

Applicable Compliance Method:

If required, emission tests shall be performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

1.e Emission Limitation:

PE shall not exceed 0.44 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable PE limitation (0.10 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

1.f Emission Limitation:

SO2 emissions shall not exceed 0.03 lb/hr.

Applicable Compliance Method:

Compliance may be determined by multiplying the actual heat input of 50 mmBtu/hr by the emission factor of 0.6 lb of SO2/mmscf and dividing by 1020 Btu/scf (from AP-42, Table 1.4-2, 7/98 version). If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

1.g Emission Limitation:

SO2 emissions shall not exceed 0.13 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable SO2 emission limitation (0.03 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

1.h Emission Limitation:

CO emissions shall not exceed 4.20 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum heat input of 50 mmBtu/hr by the emission factor of 84 lbs of CO/mmscf and dividing by 1020 Btu/scf (from AP-42, Table 1.4-1, 7/98 version). If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 10E of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

V. Testing Requirements (continued)

1.i Emission Limitation:

CO emissions shall not exceed 18.40 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable CO emission limitation (4.20 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

1.j Emission Limitation:

OC emissions shall not exceed 0.55 lb/hr.

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum heat input of 50 mmBtu/hr by the emission factor of 11 lbs of OC/mmscf and dividing by 1020 Btu/scf (from AP-42, Table 1.4-2, 7/98 version). If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 25 or 25A of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

1.k Emission Limitation:

OC emissions shall not exceed 2.41 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.55 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

1.l Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the austenitizing furnace identified above shall be determined in accordance with 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, and the modifications listed in paragraphs (B)(1) of OAC rule 3745-17-03.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after the issuance of this permit and within 6 months prior to the expiration of this permit.

b. The emission testing shall be conducted 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 or 7E 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 reheat furnace is operating at maximum capacity. The gas firing burners of the reheat furnace shall be operated at the highest firing condition rate during compliance testing to determine the NOx emission rate in lb/mmBtu.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 3 Smls Q & T Tempering Furnace (P003)

Activity Description: Reheat Furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Natural gas fired Tempering reheat furnace, with maximum heat input capacity of 112 mmBtu per hour	OAC rule 3745-31-05(A)(3) (PTI 02-15543)	Nitrogen oxides (NOx) emissions shall not exceed 0.068 lb/mmBtu (as measured at the maximum firing condition), 7.62 lbs/hr and 28.33 tpy. Particulate emissions (PE) shall not exceed 0.21 lb/hr and 0.79 tpy. Sulfur dioxide (SO2) emissions shall not exceed 0.07 lb/hr and 0.25 tpy. Carbon monoxide (CO) emissions shall not exceed 9.41 lbs/hr and 35.0 tpy. Organic compounds (OC) emissions shall not exceed 1.23 lbs/hr and 4.59 tpy. Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.
	OAC rule 3745-31-05(D) (PTI 02-15543)	NOx emissions shall not exceed 28.33 tons per rolling, 12-month period.
	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-15543]

2. The maximum annual natural gas fuel usage for this emissions unit shall not exceed 817 mmcf, based upon a rolling, 12-month summation of natural gas fuel usage.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-15543]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

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

a. the natual gas fuel usage for each month; and

b. the rolling, 12-month summation of the natural gas fuel usage.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

2. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month natural gas fuel usage limitation.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

NOx emissions shall not exceed 0.068 lb/mmBtu (as measured at the maximum firing condition).

Applicable Compliance Method:

Compliance shall be demonstrated based on emission tests performed in accordance with the requirements specified in section A.V.2.

1.b Emission Limitations:

NOx emissions shall not exceed 7.62 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined by multiplying the results of the most recent compliance test (lb/mmBtu) by the maximum heat input of 112 mmBtu/hr.

1.c Emission Limitation:

NOx emissions shall not exceed 28.33 tpy.

Applicable Compliance Method:

Compliance shall be determined by multiplying the results of the most recent compliance test (lb/mmBtu) by the actual natural gas usage (mmcf), calculated each rolling, 12-months. The product shall then be multiplied by 1020 Btu/cf and divided by 2000 lbs/ton.

1.d Emission Limitation:

PE shall not exceed 0.21 lb/hr.

Applicable Compliance Method:

If required, emission tests shall be performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

1.e Emission Limitation:

PE shall not exceed 0.79 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the emission factor of 1.9 lb of PE/mmscf (from AP-42, Table 1.4-2, 7/98 version) by the natural gas usage of 817 mmcf, based upon a rolling, 12-month summation, and dividing by 2,000 lbs/ton.

Therefore, provided compliance is shown with the operational restriction for natural gas usage in section A.II.2, then compliance will also be shown with the annual emission limitation.

1.f Emission Limitation:

SO2 emissions shall not exceed 0.07 lb/hr.

Applicable Compliance Method:

Compliance may be determined by multiplying the actual heat input of 112 mmBtu/hr by the emission factor of 0.6 lb of SO2/mmscf (from AP-42, Table 1.4-2, 7/98 version) and dividing by 1020 Btu/scf. If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

V. Testing Requirements (continued)

1.g Emission Limitation:

SO2 emissions shall not exceed 0.25 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the emission factor of 0.6 lb of SO2/mmscf (from AP-42, Table 1.4-2, 7/98 version) by the natural gas usage of 817 mmcf, based upon a rolling, 12-month summation, and dividing by 2,000 lbs/ton.

Therefore, provided compliance is shown with the operational restriction for natural gas usage in section A.II.2, then compliance will also be shown with the annual emission limitation.

1.h Emission Limitation:

CO emissions shall not exceed 9.41 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by multiplying the maximum heat input of 112 mmBtu/hr by the emission factor of 84 lbs of CO/mmscf (from AP-42, Table 1.4-1, 7/98 version) and dividing by 1020 Btu/scf. If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 10E of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

1.i Emission Limitation:

CO emissions shall not exceed 35.0 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the emission factor of 84 lb of CO/mmscf (from AP-42, Table 1.4-1, 7/98 version) by the natural gas usage of 817 mmcf, based upon a rolling, 12-month summation, and dividing by 2,000 lbs/ton.

Therefore, provided compliance is shown with the operational restriction for natural gas usage in section A.II.2, then compliance will also be shown with the annual emission limitation.

1.j Emission Limitation:

OC emissions shall not exceed 1.23 lbs/hr.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum heat input of 112 mmBtu/hr by the emission factor of 11 lbs of OC/mmscf (from AP-42, Table 1.4-2, 7/98 version) and dividing by 1020 Btu/scf. If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 25 or 25A of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

1.k Emission Limitation:

OC emissions shall not exceed 4.59 tpy.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the emission factor of 11 lb of OC/mmscf (from AP-42, Table 1.4-1, 7/98 version) by the natural gas usage of 817 mmcf, based upon a rolling, 12-month summation, and dividing by 2,000 lbs/ton.

Therefore, provided compliance is shown with the operational restriction for natural gas usage in section A.II.2, then compliance will also be shown with the annual emission limitation.

V. Testing Requirements (continued)

1.l Emission Limitation:

Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance with the visible emission limitation for the tempering furnace identified above shall be determined in accordance with 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, and the modifications listed in paragraphs (B)(1) of OAC rule 3745-17-03.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-15543]

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after the issuance of this permit and within 6 months prior to the expiration of this permit.

b. The emission testing shall be conducted 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 or 7E 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 reheat furnace is operating at maximum capacity. The gas firing burners of the reheat furnace shall be operated at the highest firing condition rate during compliance testing to determine the NOx emission rate in lb/mmBtu.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 3 Seamless Mill Rotary Furnace (P035)

Activity Description: Rotary Furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Natural gas fired No.3 Seamless Mill Rotary Furnace with maximum heat input capacity of 296 mmBtu per hour	OAC rule 3745-17-11(B)	See section A.I.2.a below.
	OAC rule 3745-17-07(A)	See section A.I.2.b below.
	OAC rule 3745-18-53(D)(4)	Sulfur dioxide (SO2) emissions shall not exceed 1.98 lbs/mmBtu of actual heat input.

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

II. Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

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

1.a Emission Limitation:

SO2 emissions shall not exceed 1.98 lbs/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance may be determined by dividing the emission factor of 0.60 pound of SO2 per mmscf of natural gas from AP-42, Table 1.4-2 (July, '98 version) by 1020 Btu/scf. If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 3 Seamless Mill No. 1 Reheat Furnace (P036)

Activity Description: Reheat Furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Natural gas fired No.1 Reheat Furnace with maximum heat input capacity of 30.8 mmBtu per hour, stationed in No. 3 Seamless Mill	OAC rule 3745-17-11(B)	See section A.I.2.a below.
	OAC rule 3745-17-07(A)	See section A.I.2.b below.
	OAC rule 3745-31-05(A)(3) (PTI 02-7768)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-18-53. See section A.I.2.c below.
	OAC rule 3745-18-53(D)(4)	Sulfur dioxide (SO2) emissions shall not exceed 1.98 lbs/mmBtu of actual heat input.

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2.c Pursuant to paragraph 9 of the 'Supplemental Information/Additional Special Terms and Conditions' in PTI 02-7768, issued July 26, 1995, the permittee shall ensure that the emissions from the low nitrogen oxides (NOx) natural gas burners, which replaced the conventional burners on the No. 1 Reheat Furnace at the No. 3 Seamless Pipe Mill, shall not exceed 0.15 lb NOx per mmBtu (as measured at the maximum firing condition).

II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emission unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

SO2 emissions shall not exceed 1.98 lbs/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance may be determined by dividing the emission factor of 0.60 pound of SO2 per mmscf of natural gas from AP-42, Table 1.4-2 (July, '98 version) by 1020 Btu/scf. If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

[Authority for term: OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

NOx emissions shall not exceed 0.15 lb/mmBtu (as measured at the maximum firing condition).

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission test performed in accordance with the requirements specified in section A.V.2.

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 prior to the expiration of this permit.

b. The emission testing shall be conducted 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 or 7E 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 reheat furnace is operating at maximum capacity. The gas firing burners of the reheat furnace shall be operated at the highest firing condition rate during compliance testing to determine the NOx emission rate in lb/mmBtu.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 3 Seamless Mill No. 2 Reheat Furnace (P037)

Activity Description: Reheat Furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Natural gas fired No.2 Reheat Furnace with maximum heat input capacity of 58.8 mmBtu per hour, stationed in No. 3 Seamless Mill	OAC rule 3745-17-11(B)	See section A.I.2.a below.
	OAC rule 3745-17-07(A)	See section A.I.2.b below.
	OAC rule 3745-31-05(A)(3) (PTI 02-7768)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-18-53. See section A.I.2.c below.
	OAC rule 3745-18-53(D)(4)	Sulfur dioxide (SO2) emissions shall not exceed 1.98 lbs/mmBtu of actual heat input.

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

2.c Pursuant to paragraph 9 of the 'Supplemental Information/Additional Special Terms and Conditions' in PTI 02-7768, issued July 26, 1995, the permittee shall ensure that the emissions from the low nitrogen oxides (NOx) natural gas burners, which replaced the conventional burners on the No. 1 Reheat Furnace at the No. 3 Seamless Pipe Mill, shall not exceed 0.15 lb NOx per mmBtu (as measured at the maximum firing condition).

II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emission unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

SO2 emissions shall not exceed 1.98 lbs/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance may be determined by dividing the emission factor of 0.60 pound of SO2 per mmscf of natural gas from AP-42, Table 1.4-2 (July, '98 version) by 1020 Btu/scf. If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

[Authority for term: OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

NOx emissions shall not exceed 0.15 lb/mmBtu (as measured at the maximum firing condition).

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission test performed in accordance with the requirements specified in section A.V.2.

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 prior to the expiration of this permit.

b. The emission testing shall be conducted 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 or 7E 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 reheat furnace is operating at maximum capacity. The gas firing burners of the reheat furnace shall be operated at the highest firing condition rate during compliance testing to determine the NOx emission rate in lb/mmBtu.

V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 4 Seamless Mill Rotary Furnace (P039)

Activity Description: Rotary Furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Natural gas fired No.4 Seamless Mill Rotary Furnace with maximum heat input capacity of 195.4 mmBtu per hour	OAC rule 3745-17-11(B)	See section A.I.2.a below.
	OAC rule 3745-17-07(A)	See section A.I.2.b below.
	OAC rule 3745-18-53(D)(4)	Sulfur dioxide (SO2) emissions shall not exceed 1.98 lbs/mmBtu of actual heat input.
	OAC rule 3745-18-53(D)(6)	SO2 emissions shall not exceed 178 lbs/hr.

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

II. Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1)]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

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:

1.a Emission Limitation:

SO2 emissions shall not exceed 1.98 lbs/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance may be determined by dividing the emission factor of 0.60 pound of SO2 per mmscf of natural gas from AP-42, Table 1.4-2 (July, '98 version) by 1020 Btu/scf. If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

[Authority for term: OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

SO2 emissions shall not exceed 178 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by dividing the emission factor of 0.60 pound of SO2 per mmscf of natural gas from AP-42, Table 1.4-2 (July, '98 version) by 1020 Btu/scf and then multiplying by the maximum heat input of 195.4 mmBtu/hr. If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 4 Seamless Mill Reheat Furnace (P040)

Activity Description: Reheat Furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Natural gas fired No.4 Seamless Mill reheat furnace with maximum heat input capacity of 50.9 mmBtu per hour	OAC rule 3745-31-05(A)(3) (PTI 02-4153)	Particulate emissions (PE) shall not exceed 0.36 lb/hr. Sulfur dioxide (SO2) emissions shall not exceed 0.03 lb/hr. Nitrogen oxides (NOx) emissions shall not exceed 7.64 lbs/hr. Carbon monoxide (CO) emissions shall not exceed 4.19 lbs/hr. Volatile organic compounds (VOC) emissions shall not exceed 0.27 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-11(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	See section A.I.2.a below.
	OAC rule 3745-31-05(A)(3) (PTI 02-7768)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). See section A.I.2.b below.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-18-53(D)(4)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2.b Pursuant to paragraph 9 of the 'Supplemental Information/Additional Special Terms and Conditions' in PTI No. 02-7768, issued July 26, 1995, the permittee shall ensure that the emissions from the low NOx natural gas burners, which replaced the conventional burners on the Reheat Furnace at the No. 4 Seamless Pipe Mill, shall not exceed 0.15 lb NOx per mmBtu (as measured at the maximum firing condition).

II. Operational Restrictions

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

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI 02-4153]

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitations:

NOx emissions shall not exceed 7.64 lbs/hr. (BAT limit)
NOx emissions shall not exceed 0.15 lb/mmBtu (PTI 02-7768)

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission test performed in accordance with the requirements specified in section A.V.2.

V. Testing Requirements (continued)

1.b Emission Limitation:

PE shall not exceed 0.36 lb/hr.

Applicable Compliance Method:

If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Methods 1 through 5 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

1.c Emission Limitation:

SO2 emissions shall not exceed 0.03 lb/hr.

Applicable Compliance Method:

Compliance may be determined by multiplying the emission factor of 0.6 lb/mmcf of natural gas from AP-42, Table 1.4-2 (July '98 version) by the maximum heat input of 50.9 mmBtu/hr, and then dividing by 1020 Btu/scf. If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 6 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

1.d Emission Limitation:

CO emissions shall not exceed 4.19 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by multiplying the emission factor of 84 lbs/mmcf of natural gas from AP-42, Table 1.4-1 (Febuary '98 version) by the maximum heat input of 50.9 mmBtu/hr, and then dividing by 1020 Btu/scf. If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 10 of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

1.e Emission Limitation:

VOC emissions shall not exceed 0.27 lb/hr.

Applicable Compliance Method:

Compliance may be determined by multiplying the emission factor of 5.5 lbs/mmcf of natural gas from AP-42, Table 1.4-2 (July '98 version) by the maximum heat input of 50.9 mmBtu/hr, and then dividing by 1020 Btu/scf. If required, emission tests shall be conducted in accordance with the test methods and procedures specified in Method 25 or 25A of 40 CFR Part 60, Appendix A while the emissions unit is operating at maximum capacity.

1.f Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance with the visible emission limitation for the No. 4 Seamless Mill Reheat Furnace identified above shall be determined in accordance with 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

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 prior to the expiration of this permit.

b. The emission testing shall be conducted 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 or 7E 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 reheat furnace is operating at maximum capacity. The gas firing burners of the reheat furnace shall be operated at the highest firing condition rate during compliance testing to determine the NOx emission rate in lb/mmBtu.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 3 Seamless Mill Rotary Mill (P048)

Activity Description: Rotary Mill

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
No. 3 Seamless Mill Rotary Mill, equipped with a cyclone separator and a venturi wet scrubber	OAC rule 3745-17-07(A)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-17-08(B).
	OAC rule 3745-17-07(B)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-17-08(B).
	OAC rule 3745-17-08(B)	See section A.I.2.a below.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 13.4 lbs/hr.

2. Additional Terms and Conditions

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

The collection efficiency shall be sufficient to eliminate visible particulate emissions of fugitive dust from the building housing this emissions unit.

All captured emissions from the No. 3 Seamless Mill Rotary Mill shall be routed to the cyclone separator, and all emissions from the cyclone separator shall be vented to the venturi scrubber.

The control equipment employed shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s), whichever is less stringent.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the scrubber and scrubber water flow rate, in gallons per minute, during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer''s recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the scrubber, in inches of water, on a once per shift basis, and record the scrubber water flow rate, in gallons per minute, on a once per shift basis.

Whenever the monitored value(s) for the pressure drop and/or scrubber water flow rate deviate(s) below the minimum value(s) specified below, the permittee shall promptly investigate the cause of the deviation(s). The permittee shall maintain records of the following information for each investigation: the date and time the deviation(s) began and the magnitude of the deviation(s) at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation(s), the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation(s) ended, the total period of time (in minutes) during which there was a deviation(s), the pressure drop readings and/or scrubber water flow rate readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the scrubber is 34 inches of water or more.

The acceptable range for the scrubber water flow rate is 590 gallons per minute or more.

These values are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the values based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the minimum value will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any building openings housing this emissions unit. These building openings shall include, but not limited to, doorways, windows, and roof monitors. The presence of any abnormal 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

IV. Reporting Requirements

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

a. the static pressure drop across the scrubber; and

b. the scrubber water flow rate.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit quarterly summaries of the operating times for this emissions unit and the associated control equipment and monitoring equipment. The quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

[Authority for term: OAC rule 3745-77-07(C)(1)]

3. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from any building openings housing 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.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

No visible emissions of fugitive dust from the building.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with USEPA Method 22. The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

[Authority for term: OAC rule 3745-77-07(C)(1)]

1.b Emission Limitation:

PE shall not exceed 0.030 grain per dry standard cubic foot of exhaust gases.

PE shall not exceed 13.4 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon an emission test performed in accordance with the requirements specified in section A.V.2.

The No. 3 Seamless Rotary Mill shall be deemed in compliance if the stack test results document a particulate emission rate that is less than the combined emission limit of 15.95 lbs/hr (based on the allowable from OAC rule 3745-17-08 [0.030 gr/dscf x (57,535 - 47,600) dscfm x 60 min/hr x 1 lb/7000 gr] plus the allowable of 13.4 lbs/hr from OAC rule 3745-17-11, Fig. II). The value of 57,535 dscfm was the recorded airflow from the scrubber during a stack test on the No. 3 Seamless Rotary Mill conducted on March 24, 1999. The value of 47,600 dscfm was the recorded stack airflow in 1968.

[Authority for term: OAC rule 3745-77-07(C)(1)]

V. Testing Requirements (continued)

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 prior to the expiration of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for PE, Methods 1 through 5 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 Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. 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 Northeast District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office 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 Ohio EPA Northeast District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Statement of Basis For Title V Permit

Part I - General	
Company Name	US Steel Corp., Lorain Tubular Operation
Premise Number	02-47-08-0961
What makes this facility a Title V facility?	**PM-10, Sulfur dioxide, Nitrogen oxides, Carbon monoxide, Volatile organic compound**
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	Yes
Were there any “common control” issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	Yes, Roadways. Changes in the frequency for monitoring a few roadways from daily to weekly.
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	New installations of emissions units: P002 and P003. Withdrawal of emissions units; K002, P001 and P038. Update permit language.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1	21-09(O)		Transfer insignificant emissions units from Part II state only section to Part II state and federally section, and to include PTI numbers and applicable SIP rules. EUs include: F002, F004, G001, L004 - L008, L11 - L012, L011 - L020, L023 - L025, L028 - L035, L037

C **Instructions for Part II:**
Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
F001	10 % opacity	17-07(B)(8)(a)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR - The following restriction applies when using dust suppressant as fugitive dust control on unpaved raodways: a. Fugitive dust suppressants shall be certified with the PCB limitations set forth in 40 CFR 76, and there are no listed hazarduos waste; b. No used oil shall be applied as dust suppresant; c. Dust suppresant shall be applied in such a manner as to prevent pollution of waters of the State as required by ORC, section 61111. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.

F001	RACM to eliminate fugitive dust	17-08(B), (B)(2, (B)(8), (B)(9)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. M-The permittee shall monitor and record the frequency of inspections to comply with RACM. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F003	20% opacity as a 3-minute avg (fugitive)	17-07(B(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR - The pressure of the water spray nozzle system for the reelers shall be maintained at a minimum of 15 psig at all times. M-The permittee shall perform daily VE checks. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
F003	RACM to eliminate fugitive dust	17-08(B)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR - The pressure of the water spray nozzle system for the reelers shall be maintained at a minimum of 15 psig at all times. M-The permittee shall perform daily VE checks. ET - The permittee shall demonstrate compliance through record keeping requirements and Test Method 9.
K003, K005, K006	3.75 lbs of VOC per gallon of coating , excludi ng water and exempt solvents	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	Y	N	N	CAM is currently not applicable. OR - K003 - maximum annual usage not to exceed 74,000 gallons, based upon a rolling, 12-month summation of the coating usage figures. OR - K005 - maximum annual usage not to exceed 43,500 gallons, based upon a rolling, 12-month summation of the coating usage figures. OR - K006 - maximum annual usage not to exceed 43,500 gallons, based upon a rolling, 12-month summation of the coating usage figures. Rp - streamlining language is included, which is as stringent or more stringent than is in the PTI 02-1973 ET - The permittee shall demonstrate compliance through record keeping requirements.
P002	0.10 lb PE per hour, 0.42 tpy PE	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.

P002	0.03 lb SO2 per hour, 0.13 tpy SO2	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P002	0.072 lb of Nox per MMBtu, 3.60 lb/hr NOx	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel.
P002	15.8 tpy NOx	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P002	4.20 lb CO per hour, 18.40 tpy CO	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P002	0.55 lb OC per hour, 2.41 tpy OC	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P002	5% opacity as a 6-minute avg	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.

P003	0.21 lb PE per hour, 0.79 tpy PE	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel, Maximum natural gas usage rate shall not exceed 817 mmft3 based on a rolling 12-month summation. M, R, & Rp are included. M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P003	0.07 lb SO2 per hour, 0.25 tpy SO2	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel, Maximum natural gas usage rate shall not exceed 817 mmft3 based on a rolling 12-month summation. M, R, & Rp are included. M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P003	0.068 lb of Nox per MMBtu, 7.62 lb/hr NOx	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel.
P003	28.33 tpy NOx	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel, Maximum natural gas usage rate shall not exceed 817 mmft3 based on a rolling 12-month summation. M, R, & Rp are included. M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P003	28.33 tpy NOx	31-05(D)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel, Maximum natural gas usage rate shall not exceed 817 mmft3 based on a rolling 12-month summation. M, R, & Rp are included. M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.

P003	9.41 lb CO per hour, 35.0 tpy CO	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel, Maximum natural gas usage rate shall not exceed 817 mmft3 based on a rolling 12-month summation. M, R, & Rp are included. M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P003	1.23 lb OC per hour, 4.59 tpy OC	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel, Maximum natural gas usage rate shall not exceed 817 mmft3 based on a rolling 12-month summation. M, R, & Rp are included. M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P003	5% opacity as a 6-minute avg	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P003	53.6 lb PE per hour	17-11	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel Less stringent than BAT
P003	20% opacity as a 6-minute avg	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel Less stringent than BAT
P035, P036, P037, P039	exempt	17-11	N	N	N	N	N	N	N	N	N	N	N	N	

P035, P036, P037, P039	exempt	17-07 (A)	N	N	N	N	N	N	N	N	N	N	N	N	
P035, P036, P037, P039	1.98 lbs of SO2 per MMBtu of actual heat input	18-53 (D)(4)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P039	178 SO2 pounds per hour	18-53 (D)(4)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P036, P037, P040	0.15 lb of Nox per MMBtu	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	Y	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. Pursuant to paragraph 9 of the 'Supplemental Information/Additional Special Terms and Conditions' in PTI No. 02-7768, issued July 26,1995, low NOx natural gas burners shall be installed and shall not exceed 0.15 lb of NOx per MMBtu and be operated to optimize the reduction of NOx. PTI No. 02-7768 was issued to 'Republic Technologies International, LLC' (formerly known as USS/Kobe Steel).
P040	0.36 lb PE per hour	31-05(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P040	0.03 lb SO2 per hour	N	31-05(A)	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.

P040	7.64 lb NOx per hour	N	31-05(A)	N	Y	Y	N	N	Y	N	Y	N	Y	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel.
P040	4.19 lb CO per hour	N	31-05(A)	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P040	0.27 lb VOC per hour	N	31-05(A)	N	Y	Y	N	N	Y	N	Y	N	N	N	CAM is currently not applicable. OR: Burn only natural gas as fuel M-The permittee shall monitor the use of inherently clean fuel. ET-The permittee shall demonstrate compliance through record keeping requirements.
P048	13.4 lbs of PE per hour	17-11	N	N	N	Y	N	N	Y	N	Y	N	Y	N	CAM is currently not applicable. M - The pressure drop across the scrubber shall be continuously maintained at a value of not less than 34 inches of water at all times while the emissions unit is in operation. The scrubber water flow rate shall be continuously maintained at a value of not less than 590 gallons per minute at all times while the emissions unit is in operation. M-The permittee shall perform daily VE checks.
P048	0.03 grain of particulate emissions per dry standard cubic foot of exhaust gases or no VE RACM to eliminate fugitive dust	17-08(B)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	CAM is currently not applicable. M - The pressure drop across the scrubber shall be continuously maintained at a value of not less than 34 inches of water at all times while the emissions unit is in operation. The scrubber water flow rate shall be continuously maintained at a value of not less than 590 gallons per minute at all times while the emissions unit is in operation. M - The permittee shall perform daily VE checks.

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

- **Instructions for Part III:**

  - All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

  - If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not <u>all</u> of the requirements have been transferred from the permit to install.

  - To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

    When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

    Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

    1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
    2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
    3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
    2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

    An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

C **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.