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

02/07/08

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-51-01-0017
Nucor Steel Marion, Inc.
Bob Hice
912 Cheney Avenue
Marion, OH 43301-1801

Dear Bob Hice:

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 Northwest 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 Northwest 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
Northwest District Office

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 02/07/08	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: 03-51-01-0017 to:

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

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

F001 (Vehicular Traffic) Truck traffic on plant roads	P009 (Rolling Mill/Reheat Furnace) Steel rolling mill including reheat furnace	Scrap steel melting
P004 (Continuous Caster) Continuous casting of steel into billets	P903 (Elec. Arc Furnace #3)	

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:

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

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. Pursuant to 40 CFR Part 64, the permittee has submitted, and the Ohio EPA has approved a compliance assurance monitoring plan for emissions unit P903 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

(Authority for term: 40 CFR Part 64)

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

Z012-standby generator
Z014-scrap piles
Z018-standby generator.

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 above 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:

P005-ladle preheat furnaces
P007-tundish preheat furnaces
Z004-hand torches
Z006-degreasing
Z007-stenciling
Z008-welding
Z009-lime load-out
Z011-scrap pulverizing
Z013-lime load-in
Z015-foamy slag load-in
Z016-foamy slag load-out
Z017-powder coat line
Z019-storage tank #1
Z020-storage tank #2.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Vehicular Traffic (F001)

Activity Description: Truck traffic on plant roads

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 and unpaved roadways and parking areas	OAC rule 3745-17-07(B)	none (See A.I.2.a.)
	OAC rule 3745-17-08(B)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

2.b This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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
paved and unpaved roadways and parking areas	none	none

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: Continuous Caster (P004)

Activity Description: Continuous casting of steel into billets

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
continuous caster, with baghouse	OAC rule 3745-17-07(B)	none (See A.I.2.a.)
	OAC rule 3745-17-08(B)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

2.b This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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
continuous caster, with baghouse	none	none

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: Rolling Mill/Reheat Furnace (P009)

Activity Description: Steel rolling mill including 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
184 mmBtu/hr and 126 tons steel per hour natural gas fired reheat furnace and rolling mill	OAC rule 3745-31-05(A)(3) (PTI #03-17377, issued 10/30/07)	27.60 lbs nitrogen oxides (NOx)/hr and 120.89 tons NOx/yr (See A.I.2.a 15.46 lbs carbon monoxide (CO)/hr and 67.72 tons CO/yr (See A.I.2.a) See A.I.2.b.
	ORC 3704.03(T)(4)	See A.I.2.c
	OAC rule 3745-17-07(A)	See A.I.2.d.
	OAC rule 3745-17-11(B)(2)	See A.I.2.e.
	OAC rule 3745-18-06(E)	766.24 lbs sulfur dioxide (SO2)/hr (See A.I.2.f)
	OAC rule 3745-21-07(B)	See A.I.2.h.
	OAC rule 3745-21-08(B)	See A.I.2.g.

2. Additional Terms and Conditions

2.a The operation of the reheat furnace results in the fluctuation of emissions over time and as such the hourly emission limitations have been established on the basis of a 24-hour block averaging period. Compliance with the hourly emission limitations shall be demonstrated through the use of continuous emission monitors.

2.b Best Available Technology (BAT) for this emissions unit has been determined to be the use of natural gas and low NOx burners.

2. Additional Terms and Conditions (continued)

2.c The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the particulate emissions (PE), particulate matter emissions 10 microns or less in size (PM10), volatile organic compound (VOC) emissions, and sulfur dioxide (SO2) emissions from this air contaminant source since the potential to emit for each of these pollutants is less than ten tons per year.

The potential to emit for this emissions unit is 6.13 tons PM10/year; determined by multiplying the AP-42, Chapter 1.4 (7/98) emission factor of 7.6 pounds total particulate matter/mmft3 by a maximum fuel usage rate of 0.1840 mmft3/hr, 8760 hours per year, and then dividing by 2,000 pounds/ton. All emissions of particulate matter are PM10.

The potential to emit for this emissions unit is 4.43 tons VOC/year; determined by multiplying the AP-42, Chapter 1.4 (7/98) emission factor of 5.5 pounds VOC/mmft3 by a maximum fuel usage rate of 0.1840 mmft3/hr, 8760 hours per year, and then dividing by 2,000 pounds/ton.

The potential to emit for this emissions unit is 0.48 tons SO2/year; determined by multiplying the AP-42, Chapter 1.4 (7/98) emission factor of 0.6 pound SO2/mmft3 by a maximum fuel usage rate of 0.1840 mmft3/hr, 8760 hours per year, and then dividing by 2,000 pounds/ton.

2.d This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

2.e The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply.

2.f The potential to emit for SO2 from this emissions unit (See A.I.2.c) is less than the emission limitation pursuant to this rule.

2.g The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques

2.h The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) based on the design of the emissions unit to use only natural gas.

2. Additional Terms and Conditions (continued)

2.i Within 30 days of the effective date of this permit, the permittee shall submit a schedule specifying dates that the following terms and conditions for NOx and CO continuous monitoring systems will be fulfilled:

i. For the NOx continuous monitoring system:

(a) A.I.2.j
(b) A.III.2
(c) A.III.3
(d) A.IV.2
(e) A.V.1

ii. For the CO continuous monitoring system:

(a) A.I.2.k
(b) A.III.4
(c) A.III.5
(d) A.IV.3
(e) A.V.2

The permittee shall comply with the proposed continuous monitoring systems schedule as approved by Ohio EPA, Northwest District Office.

2.j In accordance with the continuous monitoring systems schedule (see A.I.2.i), the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous NOx monitoring system, designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

2.k In accordance with the continuous monitoring systems schedule (see A.I.2.i), the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous CO monitoring system, designed to ensure continuous valid and representative readings of CO emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

II. Operational Restrictions

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

[OAC rule 3745-77-07(A)(1) and PTI #03-17377]

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 of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

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

2. Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specifications 2. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous NOx monitoring system meets the requirements of Performance Specification 2 and 6. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

3. The permittee shall install, operate, and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of data obtained by the continuous NOx monitoring system including, but not limited to:

a. emissions of NOx in parts per million on an instantaneous (one-minute) basis;

b. emissions of NOx in pounds per hour and in all units of the applicable standard(s) in the appropriate averaging period;

c. results of quarterly cylinder gas audits;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous NOx monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NOx monitoring system;

h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NOx monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

4. Prior to the installation of the continuous carbon monoxide (CO) monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specifications 4 or 4a (as appropriate) and 6. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous CO monitoring system meets the requirements of Performance Specifications 4 or 4a and 6. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

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

5. The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of data obtained by the continuous CO monitoring system including, but not limited to:

a. emissions of CO in parts per million on an instantaneous (one-minute) basis;

b. emissions of CO in pounds per hour and in all units of the applicable standard(s) in the appropriate averaging period;

c. results of quarterly cylinder gas audits;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous CO monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous CO monitoring system;

h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous CO monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

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.

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

IV. Reporting Requirements (continued)

2. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NOx monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NOx emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s). If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous NOx and other associated monitors;

iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the excess emissions report (EER), i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total NOx emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous NOx monitoring system while the emissions unit was in operation;

viii. results and date of quarterly cylinder gas audits;

ix. unless previously submitted, results and date of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NOx monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction* of the continuous NOx monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime* of the continuous NOx monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

3. [OAC rule 3745-77-07(C)(1) and PTI #03-17377]

IV. Reporting Requirements (continued)

The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of CO emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s). If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous CO and other associated monitors;

iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the excess emissions report (EER), i.e., a summary of any exeedances during the calendar quarter, as specified above;

v. the total CO emissions for the calendar quarter (tons);

vii. the total operating time of the continuous CO monitoring system while the emissions unit was in operation;

viii. results and dates of quarterly cylinder gas audits;

ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction* of the continuous CO monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime* of the continuous CO monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

V. Testing Requirements

1. In accordance with the continuous monitoring systems schedule (see A.I.2.i), the permittee shall conduct certification tests of the continuous NOx monitoring system in units of the applicable standard(s), to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6; and ORC section 3704.03(I).

Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous NOx monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6; and ORC section 3704.03(I).

Ongoing compliance with the NOx emissions limitations contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

2. In accordance with the continuous monitoring systems schedule (see A.I.2.i), the permittee shall conduct certification tests of the continuous CO monitoring system in units of the applicable standard(s), to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 4 or 4a (as appropriate) and 6; and ORC section 3704.03(I).

Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous CO monitoring system shall be granted upon determination by the Ohio EPA Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 4 or 4a (as appropriate) and 6 and ORC section 3704.03(I).

Ongoing compliance with the CO emission limitations contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

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

V. Testing Requirements (continued)

3.a Emission Limitations: 27.60 lbs NOx/hr and 120.89 tons NOx/yr

Applicable Compliance Method: Compliance with the lbs/hr NOx emission limitation shall be demonstrated through the operation of the continuous emissions monitor and the monitoring and record keeping requirements established in section A.III.3 of this permit. If required, the permittee may demonstrate compliance through emissions testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly limit by 8760 hrs/yr and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

3.b Emission Limitations: 15.46 lbs CO/hr and 67.72 tons CO/yr

Applicable Compliance Method: Compliance with the lbs/hr CO emission limitation shall be demonstrated through the operation of the continuous emissions monitor and the monitoring and record keeping requirements established in section A.III.3 of this permit. If required, the permittee may demonstrate compliance through emissions testing conducted in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be demonstrated by multiplying the hourly limit by 8760 hrs/yr and dividing by 2000 lbs/ton.

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

3.c Emission Limitation: 766.24 lbs SO2/hr

Applicable Compliance Method: The potential to emit for SO2 this emissions unit is less than the emission limitation pursuant to this rule.

The potential to emit for this emissions unit is 0.11 lb SO2/hr and was determined by multiplying the AP-42, Chapter 1.4 (7/98) emission factor of 0.6 pound SO2/mmft3 by a maximum fuel usage rate of 0.1840 mmft3/hr

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-18-04(A).

[OAC rule 3745-77-07(C)(1) and PTI #03-17377]

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
184 mmBtu/hr and 126 tons steel per hour natural gas fired reheat furnace and rolling mill	none	none

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: Elec. Arc Furnace #3 (P903)

Activity Description: Scrap steel melting

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
70 tons/hr electric arc furnace with baghouse and dust handling system	OAC rule 3745-31-05(A)(3) (PTI #03-16353, issued 8/18/05)	See A.I.2.a., A.I.2.i. and A.I.2.l.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(C) (PTI #03-16353, issued 8/18/05)	Baghouse Stack Emissions: 0.0050 gr of particulate emissions (PE)/dscf, 68.56 tons of PE per rolling, 12-month period (See A.I.2.b. & A.I.2.h.) 27.72 lbs nitrogen oxides (NOx)/hr, 110.88 tons of NOx per rolling, 12-month period (See A.I.2.b.) 0.25 lb lead (Pb)/hr, 1.0 ton of Pb per rolling, 12-month period (See A.I.2.b.) 0.063 lb mercury (Hg)/hr, 0.25 ton of Hg per rolling, 12-month period (See A.I.2.b.) Fugitive Emissions: 140.0 tons of fugitive PE per rolling, 12-month period (See A.I.2.b.) 81.20 tons of fugitive PM10 per rolling, 12-month period (See A.I.2.b.) 1.11 tons of fugitive NOx per rolling, 12-month period (See A.I.2.b.) 0.01 ton of fugitive Pb per rolling, 12-month period (See A.I.2.b.) 0.0025 ton of fugitive Hg per rolling, 12-month period (See A.I.2.b.)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-10 through 3745-31-20 (PTI #03-16353, issued 5/26/05)	Baghouse Stack Emissions: 17.50 lbs sulfur dioxide (SO2)/hr, 70.0 tons of SO2 per rolling, 12-month period (See A.I.2.c.) 20.02 lbs volatile organic compounds (VOC)/hr, 80.08 tons of VOC per rolling, 12-month period (See A.I.2.c.) 284.20 lbs CO/hr, 1136.80 tons of CO per rolling, 12-month period (See A.I.2.c.) Fugitive Emissions: 0.70 ton of SO2 per rolling 12-month period (See A.I.2.c.) 0.80 ton of VOC per rolling 12-month period (See A.I.2.c.) 11.37 tons of CO per rolling 12-month period (See A.I.2.c.)
	OAC rule 3745-17-07(A)	See A.I.2.d.
	OAC rule 3745-17-07(B)	See A.I.2.e.
	OAC rule 3745-17-08(B)	See A.I.2.f.
	OAC rule 3745-17-11(B)	See A.I.2.g.
	OAC rule 3745-18-06(E)	See A.I.2.g.
	40 CFR, Part 60, Subpart AAa	See A.I.2.j. and A.I.2.k.

2. Additional Terms and Conditions

2.a Best available technology (BAT) for this emissions unit has been determined to be the following:

i. use of a baghouse with an outlet grain loading concentration of 0.0050 gr PE/dscf;

ii. use of a direct-shell evacuation control system (DEC) during refining and melting;

iii. use of a segmented canopy hood, scavenger ducting, cross-draft partitioning and closed roof monitors and also includes compliance with the requirements of 40 CFR, Part 60, Subpart AAa.

2. Additional Terms and Conditions (continued)

2.b The permittee has requested the following federally enforceable emission limitations established pursuant to OAC rule 3745-31-05(C) based on a daily average throughput rate and hours of operation restrictions (See A.II.1 and A.II.2) for purposes of avoiding "Prevention of Significant Deterioration" analysis:

Baghouse stack emissions:

i. for PE: 0.005 gr PE/dscf (17.14 lbs PE/hr), 68.56 tons of PE per rolling, 12-month period;

ii. for NOx: 27.72 lbs NOx/hr, 110.88 tons of NOx per rolling, 12-month period;

iii. for Pb: 0.25 lb Pb/hr, 1.0 ton of Pb per rolling, 12-month period; and

iv. for Hg: 0.063 lb Hg/hr, 0.25 ton of Hg per rolling, 12-month period.

Fugitive Emissions:

i. for PE: 140.0 tons of fugitive PE per rolling, 12-month period;

ii. for PM10: 81.20 tons of fugitive PM10 per rolling, 12-month period;

iii. for NOx: 1.11 tons of fugitive NOx per rolling, 12-month period;

iv. for Pb: 0.01 ton of fugitive Pb per rolling, 12-month period; and

v. for Hg: 0.0025 ton of fugitive Hg per rolling, 12-month period.

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

i. for SO2: 17.50 lbs SO2/hr, 70.0 tons of SO2 per rolling, 12-month period, 0.70 ton of fugitive SO2 per rolling, 12-month period;

ii. for VOC: 20.02 lbs VOC/hr, 80.08 tons of VOC per rolling, 12-month period, 0.80 ton of fugitive VOC per rolling, 12-month period; and

iii. for CO: 284.20 lbs CO/hr, 1136.80 tons of CO per rolling, 12-month period and 11.37 tons of fugitive CO per rolling, 12-month period.

The BACT analysis determined that no controls were cost-effective.

2.d The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to 40 CFR, Part 60, Subpart AAa.

2.e This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

2.f This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

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

2.h All PE from the baghouse stack is particulate matter less than 10 microns in size (PM10).

2.i The requirements of this rule also includes compliance with OAC rule 3745-31-05(C) and OAC rule 3745-31-10 through 3745-31-20 and 40 CFR 60.272(a)(2) & 40 CFR 60.272(a)(3).

2. Additional Terms and Conditions (continued)

2.j The permittee shall not cause to be discharged into the atmosphere any gases which:

i. exit from the stack of the baghouse controlling the EAF and exhibit 3% opacity or greater; and

ii. exit from the melt shop due solely to the operation of the EAF and exhibit 6% opacity or greater.

2.k The standard for particulate matter specified by 40 CFR 60.272a(a)(1) is less stringent the emission limit established pursuant to OAC rule 3745-31-05(C). The standard for particulate matter specified by 40 CFR 60.272a(b) is less stringent the emission limit established pursuant to OAC rule 3745-31-05(A)(3).

2.l There shall be no visible PE from the building enclosing the baghouse dust handling system.

II. Operational Restrictions

1. The hourly throughput rate for this emissions unit shall not exceed 70 tons of steel (based on a daily average).

[OAC rule 3745-77-07(A)(1) and PTI #03-16353]

2. The maximum annual operating hours for this emissions unit shall not exceed 8000 hours/rolling, 12-month period, based upon the summation of the monthly numbers of operating hours.

To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI 03-16353, the permittee shall not exceed the operating hours levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	667
1-2	1334
1-3	2001
1-4	2668
1-5	3335
1-6	4002
1-7	4669
1-8	5336
1-9	6003
1-10	6670
1-11	7337
1-12	8000

After the first 12 calendar months of operation following the issuance of PTI 03-16353, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month period.

[OAC rule 3745-77-07(A)(1) and PTI #03-16353]

3. The pressure drop across the baghouse serving this emissions unit shall be maintained in the range of 0.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times, except during periods of cleaning, new bag installations and other scheduled maintenance operations.

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 64 and PTI #03-16353]

4. The permittee shall follow the procedures outlined in its "Scrap Management Program" in order to minimize the use of scrap that contains mercury, lead, oils, plastics, and organic materials that are charged in the EAF. The "Scrap Management Program" was reviewed and approved by NWDO and shall be viewed as part of the operational requirements for the EAF permit. Any change to the "Scrap Management Program" that would increase the amount of these compounds present in the scrap, or result in the emissions of an air contaminant not previously emitted, must be approved by NWDO.

[OAC rule 3745-77-07(A)(1) and PTI #03-16353]

II. Operational Restrictions (continued)

5. The control system fan motor amperes and all damper positions or the volumetric flow rate through each separately ducted hood shall be maintained at the appropriate levels established during the most recent emission testing that demonstrated that the emissions unit was in compliance.

[OAC rule 3745-77-07(A)(1), 40 CFR, Part 64 and PTI #03-16353]

III. Monitoring and/or Record Keeping Requirements

1. A continuous monitoring system for the measurement of the opacity of emissions discharged into the atmosphere from the control device(s) is not required on any modular, multi-stack, negative-pressure or positive-pressure fabric filter if observations of the opacity of the visible emissions from the control device are performed by a certified visible emission observer; or on any single-stack fabric filter if visible emissions from the control device are performed by a certified visible emission observer and the owner installs and continuously operates a bag leak detection system according to paragraph (e) of this section. Visible emission observations shall be conducted at least once per day for at least three 6-minute periods when the furnace is operating in the melting and refining period. All visible emissions observations shall be conducted in accordance with Method 9. If visible emissions occur from more than one point, the opacity shall be recorded for any points where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emission, only one set of three 6-minute observations will be required. In that case, the Method 9 observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident. Records shall be maintained of any 6-minute average that is in excess of the emission limit specified in A.I.2.j.i.

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1), 40 CFR, Part 64.3(a) and PTI #03-16353]

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

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1) and PTI #03-16353]

3. A bag leak detection system must be installed and continuously operated on all single-stack fabric filters if the permittee elects not to install and operate a continuous opacity monitoring system as provided for under A.III.1. In addition, the permittee shall meet the visible emissions observation requirements in paragraph A.III.1. of this section. The bag leak detection system must meet the specifications and requirements of paragraphs A.III.3.a. through A.III.3.h.

a. The bag leak detection system must be certified by the manufacturer to be capable of detecting particulate matter emissions at concentrations of 1 milligram per actual cubic meter (0.00044 grains per actual cubic foot) or less.

b. The bag leak detection system sensor must provide output of relative particulate matter loadings and the owner or operator shall continuously record the output from the bag leak detection system using electronic or other means (e.g., using a strip chart recorder or a data logger.)

c. The bag leak detection system must be equipped with an alarm system that will sound when an increase in relative particulate loading is detected over the alarm set point established according to paragraph A.III.3.d. of this section, and the alarm must be located such that it can be heard by the appropriate plant personnel.

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

d. For each bag leak detection system required by paragraph A.III.3. of this section, the owner or operator shall develop and submit to the Administrator or delegated authority, for approval, a site-specific monitoring plan that addresses the items identified in paragraphs (i) through (v) of this paragraph A.III.3.d. For each bag leak detection system that operates based on the triboelectric effect, the monitoring plan shall be consistent with the recommendations contained in the U.S. Environmental Protection Agency guidance document “Fabric Filter Bag Leak Detection Guidance” (EPA–454/R–98–015). The owner or operator shall operate and maintain the bag leak detection system according to the site-specific monitoring plan at all times. The plan shall describe the following:

(i) Installation of the bag leak detection system;

(ii) Initial and periodic adjustment of the bag leak detection system including how the alarm set-point will be established;

(iii) Operation of the bag leak detection system including quality assurance procedures;

(iv) How the bag leak detection system will be maintained including a routine maintenance schedule and spare parts inventory list; and

(v) How the bag leak detection system output shall be recorded and stored.

e. The initial adjustment of the system shall, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time (if applicable).

f. Following initial adjustment, the owner or operator shall not adjust the averaging period, alarm set point, or alarm delay time without approval from the Administrator or delegated authority except as provided for in paragraphs A.III.3.f.i. and A.III.3.f.ii. of this section.

(i) Once per quarter, the owner or operator may adjust the sensitivity of the bag leak detection system to account for seasonal effects including temperature and humidity according to the procedures identified in the site-specific monitoring plan required under paragraphs A.III.3.d. of this section.

(ii) If opacities greater than zero percent are observed over four consecutive 15-second observations during the daily opacity observations required under paragraph A.III.1. of this section and the alarm on the bag leak detection system does not sound, the owner or operator shall lower the alarm set point on the bag leak detection system to a point where the alarm would have sounded during the period when the opacity observations were made.

g. For negative pressure, induced air baghouses, and positive pressure baghouses that are discharged to the atmosphere through a stack, the bag leak detection sensor must be installed downstream of the baghouse and upstream of any wet scrubber.

h. Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1) and PTI #03-16353]

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

4. For each bag leak detection system installed according to paragraph A.III.3. of this section, the owner or operator shall initiate procedures to determine the cause of all alarms within 1 hour of an alarm. Except as provided for under paragraph A.III.5. of this section, the cause of the alarm must be alleviated within 3 hours of the time the alarm occurred by taking whatever corrective action(s) are necessary. Corrective actions may include, but are not limited to, the following:

a. Inspecting the baghouse for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in particulate emissions;

b. Sealing off defective bags or filter media;

c. Replacing defective bags or filter media or otherwise repairing the control device;

d. Sealing off a defective baghouse compartment;

e. Cleaning the bag leak detection system probe or otherwise repairing the bag leak detection system; and

f. Shutting down the process producing the particulate emissions.

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1) and PTI #03-16353]

5. In approving the site-specific monitoring plan required in paragraph A.III.3.d. of this section, the Administrator or delegated authority may allow owners or operators more than 3 hours to alleviate specific conditions that cause an alarm if the owner or operator identifies the condition that could lead to an alarm in the monitoring plan, adequately explains why it is not feasible to alleviate the condition within 3 hours of the time the alarm occurred, and demonstrates that the requested additional time will ensure alleviation of the condition as expeditiously as practicable.

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1) and PTI #03-16353]

6. Observations of melt shop opacity shall be performed by a certified visible emission observer as follows:

a. Shop opacity observations shall be conducted at least once per day when the furnace is operating in the meltdown and refining period.

b. Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop taken in accordance with Method 9.

c. Shop opacity shall be recorded for any point(s) where visible emission are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one observation of shop opacity will be required. In this case, the shop opacity observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1), 40CFR, Part 64.3(a) and PTI #03-16353]

7. The permittee shall either: check and record the control system fan motor amperes and damper position on a once-per-shift basis; install, calibrate, operate and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and check and record damper positions on a once-per-shift basis. The monitoring device(s) may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result. The flow rate monitoring devices shall have an accuracy of +/-10 percent over their normal operating range and shall be calibrated according to the manufacturer's instructions. The permittee may be required to demonstrate the accuracy of the monitoring devices relative to Methods 1 and 2 of Appendix A of 40 CFR Part 60.

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1), 40 CFR, Part 64.3(a) and PTI #03-16353]

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

8. When the permittee is required to demonstrate compliance with the VE limitation in section A.I.2.j.ii and at any other time that the Director (the appropriate Ohio EPA District Office or local air agency) may require, either the control system fan motor amperes and all damper positions or the volumetric flow rate through each separately ducted hood shall be determined during all periods in which a hood is operated for the purpose of capturing emissions from the affected facility subject to A.III.7.

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

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1) and PTI #03-16353]

9. The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture systems (i.e., pressure sensors, dampers, and damper switches). These inspections shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion. Any deficiencies shall be recorded and proper maintenance performed. The permittee may petition the Director (the appropriate Ohio EPA District Office or local air agency) to approve any alternative to monthly operational status inspections that will provide a continuous record of the operation of each emission capture system.

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1) and PTI #03-16353]

10. The permittee shall maintain daily records of the following for this emissions unt:

a. the tons of steel produced;

b. the number of hours the EAF was operated; and

c. the average hourly production rate (a divided by b).

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

11. The permittee shall maintain monthly records of the following information for this emissions unit:

a. the operating hours for each month;

b. during the first 12 calendar months of operation following the issuance of PTI 03-16353, the permittee shall record the cumulative numbers of the operating hours for each calendar month; and

c. beginning after the first 12 calendar months of operation following the issuance of PTI 03-16353, the rolling, 12-month numbers of the operating hours.

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

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

12. The permittee shall maintain monthly records of the following information for this emissions unit:

a. the calculated PE/PM10 emissions for each month, in tons, using the following equation:

PE = (0.0050 gr/dscf) x (400,000 cfm) x (lb/7000 gr) x (60 min/hr) x (A.III.11.a) x (ton/2000 lbs);

b. beginning the first month after the 12 calendar months of operation following the issuance of PTI 03-16353, the rolling, 12-month PE, in tons;

c. the calculated fugitive PE for each month, in tons, using the following equation:

fugitive PE = (35 lbs/hr)* x (A.III.11.a) x (ton/2000 lbs);

d. beginning the first month after the12 calendar months of operation following the issuance of PTI 03-16353, the rolling, 12-month fugitive PE, in tons;

e. the calculated fugitive PM10 emissions for each month, in tons, using the following equation:

fugitive PM10 emissions = (20.3 lbs/hr)* x (A.III.11.a) x (ton/2000 lbs);

f. beginning the first month after the 12 calendar months of operation following the issuance of PTI 03-16353, the rolling, 12-month fugitive PM10 emissions, in tons;

g. the calculated SO2 emissions for each month, in tons, using the following equation:

SO2 emissions = (17.50 lbs/hr)* x (A.III.11.a) x (ton/2000 lbs);

h. beginning the first month after the 12 calendar months of operation following the issuance of PTI 03-16353, the rolling, 12-month SO2 emission rate, in tons;

i. the calculated fugitive SO2 emissions for each month, in tons, using the following equation:

fugitive SO2 emissions = (0.18 lb/hr)* x (A.III.11.a) x (ton/2000 lbs);

j. beginning the first month after the 12 calendar months of operation following the issuance of PTI 03-16353, the rolling, 12-month fugitive SO2 emission rate, in tons;

k. the calculated NOx emissions for each month, in tons, using the following equation:

NOx emissions = (27.72 lbs/hr)* x (A.III.11.a) x (ton/2000 lbs);

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

l. beginning the first month after 12 calendar months of operation following the issuance of PTI 03-16353, the rolling, 12-month NOx emission rate, in tons;

m. the calculated fugitive NOx emissions for each month, in tons, using the following equation:

fugitive NOx emissions = (0.28 lb/hr)* x (A.III.11.a) x (ton/2000 lbs);

n. beginning the first month after the 12 calendar months of operation following the issuance of PTI 03-16353, the rolling, 12-month fugitive NOx emission rate, in tons;

o. the calculated VOC emissions for each month, in tons, using the following equation:

VOC emissions = (20.02 lbs/hr)* x (A.III.11.a) x (ton/2000 lbs);

p. beginning the first month after the12 calendar months of operation, following the issuance of PTI 03-16353, the rolling, 12-month VOC emission rate, in tons;

q. the calculated fugitive VOC emissions for each month, in tons, using the following equation:

fugitive VOC emissions = (0.20 lb/hr)*x (A.III.11.a) x (ton/2000 lbs);

r. beginning the first month after the 12 calendar months of operation, the rolling, 12-month fugitive VOC emission rate, in tons;

s. the calculated CO emissions for each month, in tons, using the following equation:

CO emissions = (284.20 lbs/hr)*x (A.III.11.a) x (ton/2000 lbs);

t. beginning the first month after 12 calendar months of operation following the issuance of PTI 03-16353, the rolling, 12-month CO emission rate, in tons;

u. the calculated fugitive CO emissions for each month, in tons, using the following equation:

fugitive CO emissions = (2.84 lbs/hr)*x (A.III.11.a) x (ton/2000 lbs);

v. beginning the first month after 12 calendar months of operation following the issuance of PTI 03-16353 , the rolling, 12-month fugitive CO emission rate, in tons;

w. the calculated Pb emissions for each month, in tons, using the following equation:

Pb emissions = (0.25 lb/hr) x (A.III.11.a) x (ton/2000 lbs);

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

x. beginning the first month after 12 calendar months of operation following the issuance of PTI 03-16353, the rolling, 12-month Pb emission rate, in tons;

y. the calculated fugitive Pb emissions for each month, in tons, using the following equation:

fugitive Pb emissions = (0.0025 lb/hr)* x (A.III.11.a) x (ton/2000 lbs);

z. beginning the first month after 12 calendar months of operation, following the issuance of PTI 03-16353, the rolling, 12-month fugitive Pb emission rate;

aa. the calculated Hg emissions for each month, in tons, using the following equation:

Hg emissions = (0.063 lb/hr)* x (A.III.11.a) x (ton/2000 lbs);

ab. beginning the first month after 12 calendar months of operation following the issuance of PTI 03-16353, the rolling, 12-month Hg emission rate, in tons;

ac. the calculated fugitive Hg emissions for each month, in tons, using the following equation:

fugitive Hg emissions = (0.00063 lb/hr)* x (A.III.11.a) x (ton/2000 lbs); and

ad. beginning the first month after 12 calendar months of operation following the issuance of PTI 03-16353 , the rolling, 12-month fugitive Hg emission rate, in tons.

* for fugitive PE, the maximum hourly emission rate (35 lbs/hr) = 70 tons/hr (maximum capacity of EAF) x 50 lbs PE/tons of steel (emission factor from AP-42, Section 12.5 (revised 1/95) x [1- 0.99 (capture efficiency)]

for fugitive PM10, the maximum hourly emission rate (20.3 lbs/hr) = total PE (35 lbs/jr) x weight fraction of PM10 (0.58)

for NOx, the maximum hourly emission rate (27.72 lbs/hr) = 70 tons steel/hr x 0.396 lb NOx/ton (company-supplied emission factor)

for fugitive NOx, the maximum hourly emission rate (0.28 lb/hr) = 27.72 lbs NOx/hr x (1-0.99)

for SO2, the maximum hourly emission rate (17.5 lbs/hr) = 70 tons steel/hr x 0.25 lb SO2/ton (company-supplied emission factor)

for fugitive SO2, the maximum hourly emission rate (0.18 lb/hr) = 17.5 lbs SO2/hr x (1-0.99)

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

for VOC, the maximum hourly emission rate (20.02 lbs/hr) = 70 tons steel/hr x 0.286 lb VOC/ton (company-supplied emission factor)

for fugitive VOC, the maximum hourly emission rate (0.20 lbs/hr) = 20.02 lbs VOC/hr x (1-0.99)

for CO, the maximum hourly emission rate (284.20 lbs/hr) = 70 tons steel/hr x 4.06 lb CO/ton (company-supplied emission factor)

for fugitive CO, the maximum hourly emission rate (2.84 lbs/hr) = 284.20 lbs CO/hr x (1-0.99)

for Pb, the maximum hourly emission rate (0.25 lb/hr) = 70 tons steel/hr x 0.0035 lb CO/ton (company-supplied emission factor)

for fugitive Pb, the maximum hourly emission rate (0.0025 lbs/hr) = 0.25 lbs Pb/hr x (1-0.99)

for Hg, the maximum hourly emission rate (0.063 lb/hr) = 70 tons steel/hr x 0.0009 lb Hg/ton (company-supplied emission factor)

for fugitive Hg, the maximum hourly emission rate (0.00063 lbs/hr) = 0.063 lb Hg/hr x (1-0.99)

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

13. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be 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 baghouse on a once per shift basis.

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64.3(a) and PTI #03-16353]

14. The permittee shall obtain a sample of the EAF baghouse dust on a monthly basis. At a minimum, the samples shall be analyzed for the magnesium, manganese, lead, zinc, and mercury contents. The results shall be reported in weight percent. This analysis shall be conducted in accordance with U.S. EPA test methods and procedures.

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

15. The permittee shall keep daily records that indicate whether or not scrap was handled in accordance with the permittee's "Scrap Management Program".

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

16. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for the baghouse controlling this emissions unit are the static pressure drop across the baghouse, which was established in accordance with the manufacturer's recommendations, opacity monitoring of the baghouse and fan motor amperage on the collection system. When the performance indicators show operation outside the indicator range(s), the permittee shall take corrective actions to restore operation of the emissions unit and/or its control equipment to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions, and shall comply with the reporting requirements specified in Section A.IV below. The emissions unit and control equipment shall be operated in accordance with the approved CAM Plan, or any approved revision of the Plan. The baghouse shall not be configured to have bypass capability.

[OAC 3745-77-07(A)(3)(a) and (b), 40 CFR 64.3(a), 64.6(c), 64.7(d), and 64.8]

17. At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[OAC 3745-77-07(C)(1) and 40 CFR 64.7(b)]

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

18. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency, and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[OAC 3745-77-07(C)(1) and 40 CFR 64.7(e)]

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that:

a. identify all exceedances of gasses which exit from the stack of the baghouse controlling the EAF and exhibit 3% opacity or greater;

b. indicate a period of excess emission for opacity observations of gasses which exit from the melt shop due solely to the operation of the EAF and exhibit 6% opacity or greater. Excess emissions shall be reported in accordance with 40 CFR Part 60.7(c).

These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1), 40 CFR, Part 64.7(d), 40 CFR, Part 64.9(a) and PTI #03-16353]

2. The permittee shall submit quarterly deviation (excursions) reports that identify the following:

a. all exceedances of the hourly steel throughput rate of 70 tons (based on a daily average).

b. after the first 12 calendar months of operation following the issuance of PTI 03-16353, all exceedances of the rolling, 12-month operating hours restriction of 8000 . During the first 12 calendar months of operation following the issuance of PTI 03-16353, all exceedances of the maximum allowable cumulative operating hours restrictions.

c. after the first 12 calendar months of operation following the issuance of PTI 03-16353, all exceedances of the rolling, 12-month emission limitations specified in section A.I.1 of this permit.

d. all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.3 of the terms and conditions of this permit.

e. all periods of time during which the scrap was not handled in accordance with the permittee's "Scrap Management Program".

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

[OAC rule 3745-77-07(C)(1), 40 CFR, Part 64.7(d), 40 CFR, Part 64.9(a) and PTI #03-16353]

3. The permittee shall submit semiannual written reports that identify operation of control system fan motor amperes at values exceeding + 15 percent of the value established under A.III.4 or operation at flow rates lower than those established under A.III.4. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1), 40 CFR, Part 64.7(d), 40 CFR, Part 64.9(a) and PTI #03-16353]

IV. Reporting Requirements (continued)

4. The permittee shall submit the results of all baghouse dust analyses. The results shall be submitted within 30 days after the analysis is completed.

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

V. Testing Requirements

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

a. The emission testing shall be conducted 6 months after permit issuance and no less than 6 months prior to the expiration of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, NOx, CO, SO2, VOC, Pb and Hg.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Methods 1 through 4 and 5D of 40 CFR, Part 60, Appendix A; for NOx, Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A; for SO2, Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A; for VOC, Methods 1 through 4 and Method 18, 25 or 25A of 40 CFR, Part 60, Appendix A; Pb, Methods 1 through 4 and 12 or 29 of 40 CFR, Part 60, Appendix A; and for Hg, Methods 1 through 4 and 29 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. Method 5D shall be used for positive-pressure fabric filters to determine the PE concentration and volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 4 hours and 4.50 dscm (160 dscf) and the sampling time shall include an integral number of heats.

e. The test runs shall be conducted concurrently, unless inclement weather interferes.

f. The tests shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

2. During the PE testing, the permittee shall obtain the following additional information:

a. for all heats covered by the test:

i. charge weights and materials, and tap weights and materials;

ii. heat times, including start and stop times, and a log of process operation, including periods of no operation during testing.

iii. control device operation log; and

b. The control system fan motor amperes and all damper positions or the volumetric flow rate through each separately ducted hood shall be determined during all periods in which a hood is operated for the purpose of capturing emissions from the affected facility.

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

3. Concurrent with the PE testing, opacity observations shall be performed to demonstrate compliance with the opacity limitations contained in A.I.2.j.i and A.I.2.j.ii. The opacity testing shall be conducted in accordance with 40 CFR Part 60.8.

[40 CFR, Part 60, Subpart AAa, OAC rule 3745-77-07(C)(1) and PTI #03-16353]

V. Testing Requirements (continued)

4. 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, Northwest 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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA, Northwest 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 tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

The report shall also include all information required by 40 CFR 60.276a(f).

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

5. Compliance with the emission limitations in Section A.I.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

5.a Emission Limitations: 0.0050 gr/dscf, 68.56 tons of PE per rolling, 12-month period

Applicable Compliance Method: The permittee shall demonstrate compliance with the gr PE/dscf limitation based on the results of emission testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

As long as compliance with the gr PE/dscf and the restriction on the number of hours of operation is maintained, compliance with the annual limitation shall be assumed (the annual limitation was developed by multiplying the hourly limitation* by 8,000, and then dividing by 2000 lbs/ton).

The permittee shall also demonstrate compliance with the annual allowable limitation based on the record keeping requirements established in section A.III of this permit.

* hourly limitation = (0.0050 gr PE/dscf) x [maximum volumetric flow rate (400,000 dscf)] x (1 lb/7,000 grains) x (60 minutes/hr)

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

V. Testing Requirements (continued)

5.b Emission Limitations: 140.0 tons of fugitive PE per rolling, 12-month period, 81.20 tons of fugitive PM10 per rolling, 12-month period

Applicable Compliance Method:

The annual allowable fugitive PE was established as follows:

i. Multiply the emission factor, from AP-42, Table 12.5-1 (revised 10/86), of 50 lbs PE/ton of steel by the maximum hourly capacity of the EAF (70 tons/hr).

ii. Multiply the result from i above by the capture factor of (1-0.99)*, and

iii. Multiply the result form ii by the maximum allowable number of hours of operation of 8000, and the divide by y 2000 lbs/ton.

Therefore, as long as compliance with the restriction on the number of hours of operation is maintained, compliance with the annual PE limitation shall be assumed.

The annual allowable fugitive PM10 emissions was established as follows:

i. Multiply the emission factor, from AP-42, Table 12.5-1 (revised 10/86), of 29 lbs PM10/ton of steel by the maximum hourly capacity of the EAF (70 tons/hr).

ii. Multiply the result from i above by the capture factor of (1-0.99)*, and

iii. Multiply the result form ii by the maximum allowable number of hours of operation of 8000, and the divide by y 2000 lbs/ton.

Therefore, as long as compliance with the restriction on the number of hours of operation is maintained, compliance with the annual PM10 emission limitation shall be assumed.

The permittee shall demonstrate compliance with the annual allowable emission limitations above based on the record keeping requirements established in section A.III of this permit.

* capture efficiency for the control system is assumed to be 99%

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

5.c Emission Limitation: 27.72 lbs NOx/hr, 110.88 tons of NOx per rolling, 12-month period

Applicable Compliance Method:

The hourly allowable NOx emission limitation was established by multiplying the maximum capacity of the EAF (70 tons/hr) by the company-supplied emission factor of 0.396 lb NOx/ton of steel (base on a May 2004 stack testing).

The permittee shall demonstrate compliance with the hourly allowable NOx emission limitation based on the results of stack testing conducted in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly allowable NOx emission limitation and the restriction on the number of hours of operation is maintained, compliance with the annual emission limitation shall be assumed (the annual limitation was developed by multiplying the hourly limitation by 8,000, and then dividing by 2000 lbs/ton). The permittee shall also demonstrate compliance with the annual allowable emission limitation based on the record keeping requirements established in section A.III of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

V. Testing Requirements (continued)

5.d Emission Limitations: 0.25 lb Pb/hr, 1.0 tons of Pb per rolling, 12-month period, and 0.01 ton of fugitive Pb per rolling, 12-month period

Applicable Compliance Method:

The hourly allowable Pb emission limitation was established by multiplying the maximum capacity of the EAF (70 tons/hr) by the company-supplied emission factor of 0.0035lb Pb/ton of steel (base on the May 2004 stack testing).

The permittee shall demonstrate compliance with the hourly allowable Pb emission limitation based on the results of stack testing conducted in accordance with Methods 1 - 4 and 29 of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly allowable Pb emission limitation and the restriction on the number of hours of operation is maintained, compliance with the annual emission limitation shall be assumed (the annual limitation was developed by multiplying the hourly limitation by 8,000, and then dividing by 2000 lbs/ton).

The annual allowable fugitive Pb emission limitation was established by multiplying the annual allowable Pb emission limitation by 1(- 0.99)*.

The permittee shall also demonstrate compliance with the annual allowable emission limitation above based on the record keeping requirements established in section A.III of this permit.

* capture efficiency for the control system is assumed to be 99%

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

5.e Emission Limitations: 0.063 lb Hg/hr, 0.25 ton of Hg per rolling, 12-month period, and 0.0025 ton of fugitive Hg per rolling, 12-month period

Applicable Compliance Method:

The hourly allowable Hg emission limitation was established by multiplying the maximum capacity of the EAF (70 tons/hr) by the company-supplied emission factor of 0.0009 lb Hg/ton of steel (base on the December 1999 stack testing).

The permittee shall demonstrate compliance with the hourly allowable Hg emission limitation based on the results of stack testing conducted in accordance with Methods 1 - 4 and 29 of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly allowable Hg emission limitation and the restriction on the number of hours of operation is maintained, compliance with the annual emission limitation shall be assumed (the annual limitation was developed by multiplying the hourly limitation by 8,000, and then dividing by 2000 lbs/ton).

The annual allowable fugitive Hg emission limitation was established by multiplying the annual allowable Hg emission limitation by 1(- 0.99)*.

The permittee shall also demonstrate compliance with the annual allowable emission limitation above based on the record keeping requirements established in section A.III of this permit.

* capture efficiency for the control system is assumed to be 99%

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

V. Testing Requirements (continued)

5.f Emission Limitation: 17.50 lbs SO2/hr, 70.0 tons of SO2 per rolling, 12-month period, and 0.70 ton of fugitive SO2 per rolling, 12-month period

Applicable Compliance Method:

The hourly allowable SO2 emission limitation was established by multiplying the maximum capacity of the EAF (70 tons/hr) by the company-supplied emission factor of 0.25 lb SO2/ton of steel (base on the September 1999 stack testing).

The permittee shall demonstrate compliance with the hourly allowable SO2 emission limitation based on the results of stack testing conducted in accordance with Methods 1 - 4 and 29 of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly allowable SO2 emission limitation and the restriction on the number of hours of operation is maintained, compliance with the annual emission limitation shall be assumed (the annual limitation was developed by multiplying the hourly limitation by 8,000, and then dividing by 2000 lbs/ton).

The annual allowable fugitive SO2 emission limitation was established by multiplying the annual allowable SO2 emission limitation by 1(- 0.99)*.

The permittee shall also demonstrate compliance with the annual allowable emission limitation above based on the record keeping requirements established in section A.III of this permit.

* capture efficiency for the control system is assumed to be 99%

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

5.g Emission Limitation: 20.02 lbs VOC/hr, 80.08 tons of VOC per rolling, 12-month period, and 0.80 ton of fugitive VOC per rolling, 12-month period

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the maximum capacity of the EAF (70 tons/hr) by the company-supplied emission factor of 0.286 lb VOC/ton of steel (base on the September 1999 stack testing).

The permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based on the results of stack testing conducted in accordance with Methods 1 - 4 and 29 of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly allowable VOC emission limitation and the restriction on the number of hours of operation is maintained, compliance with the annual emission limitation shall be assumed (the annual limitation was developed by multiplying the hourly limitation by 8,000, and then dividing by 2000 lbs/ton).

The annual allowable fugitive VOC emission limitation was established by multiplying the annual allowable VOC emission limitation by 1(- 0.99)*.

The permittee shall also demonstrate compliance with the annual allowable emission limitation above based on the record keeping requirements established in section A.III of this permit.

* capture efficiency for the control system is assumed to be 99%

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

V. Testing Requirements (continued)

5.h Emission Limitation: 284.20 lbs CO/hr, 1136.80 tons of CO per rolling, 12-month period, and 11.37 tons of fugitive CO per rolling, 12-month period

Applicable Compliance Method:

The hourly allowable CO emission limitation was established by multiplying the maximum capacity of the EAF (70 tons/hr) by the company-supplied emission factor of 4.06 lbs CO/ton of steel (base on the May 2004 stack testing).

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation based on the results of stack testing conducted in accordance with Methods 1 - 4 and 29 of 40 CFR, Part 60, Appendix A.

As long as compliance with the hourly allowable CO emission limitation and the restriction on the number of hours of operation is maintained, compliance with the annual emission limitation shall be assumed (the annual limitation was developed by multiplying the hourly limitation by 8,000, and then dividing by 2000 lbs/ton).

The annual allowable fugitive CO emission limitation was established by multiplying the annual allowable CO emission limitation by 1(- 0.99)*.

The permittee shall also demonstrate compliance with the annual allowable emission limitation above based on the record keeping requirements established in section A.III of this permit.

* capture efficiency for the control system is assumed to be 99%

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

5.i Emission Limitation: 3% opacity from the exit of the EAF baghouse

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

5.j Emission Limitation: 6% opacity from the exits of the melt shop due solely to the operation of the EAF

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

5.k Emission Limitation: There shall be no visible emissions from the building enclosing the baghouse dust handling system.

Applicable Compliance Method: The permittee shall demonstrate compliance with the visible emissions limitation above pursuant to Method 22 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-16353]

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
70 tons/hr electric arc furnace with baghouse and dust handling system	none	none

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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THIS IS THE LAST PAGE OF THE PERMIT

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Statement of Basis For Title V Permit

Part I - General	
Company Name	Nucor Steel Company, Inc.
Premise Number	0351010017
What makes this facility a Title V facility?	CO, NOx, PE and VOC
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.	NO
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)	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 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)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
N/A			

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												
P009	None	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

P903	None	17-07(A)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 60, Subpart AAa. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
F001, P004, P903	Exempt	17-07(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
F001, P004, P903	Exempt	17-08(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P009	None	17-11(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P903	None	17-11(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

P009	766.24 lbs SO_2/hr	18-06(E)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-The potential to emit for this emission unit is less than the emission limitation established pursuant to this rule. The potential to emit for this emission unit is 0.11 lb/hr and was determined by multiplying the AP-42 emission factor of 0.6 lb/mmft^3 by a maximum of 0.1840 mmft^3/hr. These calculations are sufficient to show compliance.
P903	None	18-06(E)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P009	None	21-07(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) based on the design of the emissions unit to use only natural gas. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P009	None	21-08(B)	N	Y	N	N	N	N	N	N	N	N	N	N	ND-The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.

P009	None	N	ORC 3704.03(T)(4)	Y	N	N	N	N	N	N	N	N	N	N	ND-The BAT requirements under OAC rule 3745-31-05 (A)(3) do not apply to the PE, PM_{10}, VOC and SO_2 emissions from this air contaminant source since the potential to emit for each of these pollutants is less than ten tons per year. M, R, Rp & ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P009	27.60 lbs NOx/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is economically justified. CAM is not currently applicable. ET-Compliance with the lb/hr limitation shall be demonstrated through the use of a CEM.
P009	120.89 tons NOx/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly emission rate recorded by the CEM and actual annual hours of operation are sufficient to show compliance.
P009	15.46 lbs CO/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is economically justified. CAM is not currently applicable. ET-Compliance with the lb/hr limitation shall be demonstrated through the use of a CEM.
P009	67.72 tons CO/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly emission rate recorded by the CEM and actual annual hours of operation are sufficient to show compliance.

P903	There shall be no visible emissions from the building enclosing the baghouse dust handling system.	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Baghouse parametric monitoring. M & R includes records of baghouse pressure drop. COM is not economically justified. CAM is not available. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
P903	0.0050 gr PE/dscf	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-Baghouse parametric monitoring. M & R includes records of baghouse pressure drop. COMs are not economically justified. CAM is not available.
P903	68.56 tons of PE per rolling, 12-month period	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Baghouse parametric monitoring and hours of operation restriction. M & R includes records of baghouse pressure drop, monthly records of hours of operation and monthly records of PE emissions. COMs are not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P903	27.72 lbs NOx/hr	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-Hourly throughput restriction based on a daily average. M & R includes daily records of average hourly production rate. CEM is not economically justified. CAM is not available.
P903	110.88 tons of NOx per rolling, 12-month period	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of NOx emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P903	0.25 lb Pb/hr	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-Hourly throughput restriction based on a daily average. M & R includes daily records of average hourly production rate. CEM is not economically justified. CAM is not available.

P903	1.0 tons of Pb per rolling, 12-month period	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of Pb emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P903	0.063 lb mercury (Hg)/hr	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-Hourly throughput restriction based on a daily average. M & R includes daily records of average hourly production rate. CEM is not economically justified. CAM is not available.
P903	0.25 tons of Hg per rolling, 12-month period	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of Hg emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P903	140.0 tons of fugitive PE per rolling, 12-month period	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of fugitive PE emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit, a 99% capture efficiency and actual annual hours of operation are sufficient to show compliance.
P903	81.20 tons of fugitive PM10 per rolling, 12-month period	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of fugitive PM_{10} emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit, a 99% capture efficiency and actual annual hours of operation are sufficient to show compliance.
P903	1.11 tons of fugitive NOx per rolling, 12-month period	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of fugitive NOx emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit, a 99% capture efficiency and actual annual hours of operation are sufficient to show compliance.

P903	0.01 tons of fugitive Pb per rolling, 12-month period	N	31-05(C)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of fugitive NOx emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit, a 99% capture efficiency and actual annual hours of operation are sufficient to show compliance.
P903	17.50 lb SO_2/hr	N	31-10 through 31-20	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR-Hourly throughput restriction based on a daily average. M & R includes daily records of average hourly production rate. CEM is not economically justified. CAM is not available.
P903	70.0 tons of SO2 per rolling, 12-month period	N	31-10 through 31-20	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of SO_2 emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P903	20.02 lbs VOC/hr	N	31-10 through 31-20	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hourly throughput restriction based on a daily average. M & R includes daily records of average hourly production rate. CEM is not economically justified. CAM is not available.
P903	80.08 tons of VOC per rolling, 12-month period	N	31-10 through 31-20	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of VOC emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P903	284.20 lbs CO/hr	N	31-10 through 31-20	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hourly throughput restriction based on a daily average. M & R includes daily records of average hourly production rate. CEM is not economically justified. CAM is not available.
P903	1136.80 tons of CO per rolling, 12-month period	N	31-10 through 31-20	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of CO emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.

P903	0.70 tons of fugitive SO2 per rolling 12-month period	N	31-10 through 31-20	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of fugitive SO_2 emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit, a 99% capture efficiency and actual annual hours of operation are sufficient to show compliance.
P903	0.80 tons of fugitive VOC per rolling 12-month period	N	31-10 through 31-20	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of fugitive VOC emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit, a 99% capture efficiency and actual annual hours of operation are sufficient to show compliance.
P903	11.37 tons of fugitive CO per rolling 12-month period	N	31-10 through 31-20	N	Y	Y	N	N	Y	N	Y	N	N	N	OR-Hours of operation restriction. M & R includes monthly records of hours of operation and monthly records of fugitive CO emissions. CEM is not economically justified. CAM is not available. ET-Calculations based on maximum hourly potential to emit, a 99% capture efficiency and actual annual hours of operation are sufficient to show compliance.
P903	The permittee shall not cause to be discharged into the atmospher any gases which exit from the stack of the baghouse controlling the EAF and exhibit 3% opacity or greater	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-40 CFR, Part 60, Subpart AAa OR-Baghouse pressure drop monitoring. M & R includes records of baghouse pressure drop, records of daily Method 9 observations. COM is not economically justified. CAM is not available. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.

P903	The permittee shall not cause to be discharged into the atmospher any gases which exit from the melt shop due solely to the operation of the EAF and exhibit 6% opacity or greater.	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other-40 CFR, Part 60, Subpart Aaa Other-40 CFR, Part 60, Subpart AAa OR-Baghouse pressure drop monitoring. M & R includes records of baghouse pressure drop, records of daily Method 9 observations. COM is not economically justified. CAM is not available. provide indication of ongoing compliance. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.

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

C Instructions for Part III:

C 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.

C 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 all 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.