



State of Ohio Environmental Protection Agency

Street Address:

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P.O. Box 1049
Columbus, OH 43216-1049

05/13/08

CERTIFIED MAIL

**RE: Draft Title V Chapter 3745-77
permit**

15-76-00-0378
Jewel Acquisition, LLC. - Louisville Facility
Deborah L Calderazzo
100 River Road
Brackenridge, PA 15014

Dear Deborah L Calderazzo:

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 Canton Division of Air Pollution Control 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 Canton Division of Air Pollution Control.

Sincerely,

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

cc: USEPA (electronically submitted)
File, DAPC PIER
Canton Division of Air Pollution Control
Pennsylvania
West Virginia



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 05/13/08

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: 15-76-00-0378 to: Jewel Acquisition, LLC. - Louisville Facility 1500 West Main Street Louisville, OH 44641

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include F002 (Plant-wide Vehicular Traffic), P005 (#2HAP - Pickle Tanks), P009 (#2HAP - Shot Blaster), P010 (#2HAP - EquAnnFce), P011 (#2HAP - PreAnnFce), P017 (#2CAP - Preheat 1 AnnFce), P018 (#2CAP - Preheat 2 AnnFce), P019 (#2CAP - Pickle Tanks), and P024 (#2CAP - EquAnnFce).

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:

Canton Division of Air Pollution Control 420 Market Avnue N. Canton, OH 44702-1544 (330) 489-3385

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 Federally Enforceable 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 (CAM) plan for emissions units P005, P009 and P019 at this facility. The permittee shall comply with the provisions of the CAM plan during any operation of the aforementioned emissions units.
2. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.
3. The following insignificant emissions units are located at this facility:

B003 - package boiler #1, 8.37 MMBtu/hr;
B004 - package boiler #2, 8.37 MMBtu/hr;
B005 - package boiler #3, 7.53 MMBtu/hr (temporary);
B006 - package boiler #4, 7.53 MMBtu/hr (temporary);
G001 - gasoline dispensing facility (PTI 15-344);
P002 - 52-inch bright anneal pickle tanks (HNO₃) with acid fume scrubber;
P014 - six (6), natural gas-fired bell hood anneal furnaces; and
P026 - natural gas-fired bright anneal furnace, 14.7 MMBtu/hr, with low NO_x burners (PTI 15-1269).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within 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 federally-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:

P015 - #1 cross cut saws with dust collector;
P020 - #2 CAP line caustic rinse tank, Kolene (KOH) rinse with fume scrubber;
P021 - #2 CAP steam superheater;
P022 - 4.5 MMBtu/hr natural gas-fired CAP line caustic tank rinse heater;
T001 - No. 2 fuel oil tank, L21, 120,000 gallons;
Z009 - Z mill, cold rolling of specialty steels;
Z014 - wastewater treatment plant (WWTP) with natural gas-fired space heater;
Z016 - Safety Kleen parts degreasers;
Z017 - Varsol mineral spirits solvent degreasing tanks;
Z112 - H₂SO₄ storage tank;
Z113 - HNO₃ storage tank;
Z114 - HNO₃ storage tank;
Z115 - 32,000 gallon raw HF acid storage tank, exhausting to water tank scrubber;
Z116 - HNO₃ storage tank;
Z117 - ferrous chloride tank;
Z124 - lime silos for waste water treatment plant;
Z125 - 4.5 MMBtu/hr natural gas-fired #2 CAP hot air dryer; and
Z127 - refrigerants.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Vehicular traffic (F002)
Activity Description: Plant-wide Vehicular Traffic

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
roadways and parking areas: approximately 1.2 miles of paved and 0.3 mile unpaved (gravel) roadways and 323,284 sq. ft. of paved and unpaved parking areas used by vehicles with 4 to 18 wheels.	OAC rule 3745-17-07(B)(4)	There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.
	OAC rule 3745-17-08(B)(8)	reasonably available control measures (see sections A.I.2.c., A.I.2.d., A.I.2.e., and A.I.2.i.)
	OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions from any unpaved road or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.
	OAC rule 3745-17-08(B)(2)	reasonably available control measures (see sections A.I.2.f. through A.I.2.i.)

2. Additional Terms and Conditions

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

Paved roadways:
 Asphalt 1.2 miles

Paved parking areas:	
Permittee's identification	Approx. area (sq. ft.)
A. Asphalt	155,509
B. Asphalt	57,150
C. Asphalt	70,425

V. Testing Requirements

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

1.a Emission Limitation:

There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 22 of 40 CFR Part 60, Appendix A, and the modifications listed in paragraph (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03. The visible emission limitation applies to each separate road segment and/or parking area identified in section A.I.2.

1.b Emission Limitation:

There shall be no visible particulate emissions from any unpaved road or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 22 of 40 CFR Part 60, Appendix A. The visible emission limitation applies to each separate road segment and/or parking area identified in section A.I.2.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

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: #2HAP - Pickle Tanks (P005)
Activity Description: #2 Hot Line acid pickle tanks

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - #2 Hot Anneal & Pickle (HAP) Line, Pickling Tanks #1, #2, #3 equipped with Ceilcote packed-bed acid fume wet scrubber with NaOH oxidizer	OAC rule 3745-17-11	The particulate (including acid fumes) emissions shall not exceed 4.70 lbs/hr.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See sections A.III.1 through A.III.6 and A.IV.1 through A.IV.2.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

[Authority for the term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64]

III. Monitoring and/or Record Keeping Requirements

1. The CAM plan for this emissions unit has been developed for particulate emissions (as acid fumes). The CAM performance indicators for the scrubber controlling this emissions unit are: (a) daily inspections for visible emissions from the control device exhaust stack; and (b) the water supply pressure and flow rate gauge measurements to the wet scrubber.

The CAM performance indicator values were established in accordance with the manufacturer's recommendations and verified during particulate emissions testing. When any of the performance indicators are outside of the indicator ranges, the permittee shall take corrective action 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 to comply with the reporting requirements specified in Section A.IV below.

Scrubber operating parameters shall be re-verified through periodic emission testing or as a result of changes to the operating conditions of the scrubber or emissions unit. In addition to visible emissions monitoring and periodic monitoring of the scrubber operating parameters, the permittee also has an inspection/preventative maintenance program for the scrubber and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the scrubber shall be made as needed. If the current CAM indicators and/or the scrubber and capture system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(A)(3)(a), OAC rule 3745-77-07(A)(3)(b), 40 CFR Part 64.3(a), 40 CFR Part 64.6(c), 40 CFR Part 64.7(d), and 40 CFR Part 64.8]

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

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

[Authority for term: OAC rule 3745-77-07(C), and 40 CFR Part 64.6(c)]

3. The permittee shall maintain necessary parts for routine repairs of the monitoring equipment.

[Authority for term: OAC rule 3745-77-07(C) and 40 CFR 64.7(b)]

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

4. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water supply pressure and the water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the scrubber water supply pressure, in psig, on a once-per-shift basis;
- b. the scrubber water flow rate, in gpm, on a once-per-shift basis; and
- c. a log or record of operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

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

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

- d. The scrubber water supply pressure shall be continuously maintained at all times while the emissions unit is in operation at a value of not less than 24.0 psig, the value established during a compliance test of 11/19/2000, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.
- e. The scrubber water flow rate shall be continuously maintained at all times while the emissions unit is in operation at a value of not less than 225 gallons per minute, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

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

[Authority for term: [Authority for term: OAC rule 3745-77-07(C), 40 CFR 64.6(c), 40 CFR 64.7(b) and 40 CFR Part 64.3(a)(2)]

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

5. In addition to the parametric monitoring required in Section A.III.4 of this permit, the permittee shall conduct visual inspections of the scrubber's spray nozzles every six (6) months. At a minimum, each spray nozzle shall be inspected for the following:
 - a. look for excessive wear, or clogging of each spray nozzle; and
 - b. determination of the directional output of the spray nozzle's (i.e., are the nozzle's spraying in a manner that ensures that the spray is covering the entire gas stream).

Records of these inspections shall be kept in accordance with the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C) and 40 CFR 64.7(e)]

6. The permittee shall maintain a supply of replacement nozzles, or any other parts necessary to ensure that the scrubbing system will operate properly. Any worn, or clogged nozzles shall be replaced, or fixed during the inspection.

[Authority for term: OAC rule 3745-77-07(C) and 40 CFR 64.7(e)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to minimize or eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C), 40 CFR Part 64.9]

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the scrubber water supply pressure was below the acceptable value;
 - b. each period of time when the scrubber water flow rate was below the acceptable value;
 - c. an identification of each incident of deviation described in (a) and (b) above where a prompt investigation was not conducted;
 - d. an identification of each incident of deviation described in (a) and (b) where prompt corrective action, that would bring the water supply pressure and/or the scrubber water flow rate into compliance with the acceptable value, was determined to be necessary and was not taken;
 - e. an identification of each incident of deviation described in (a) and (b) where proper records were not maintained for the investigation and/or the corrective action.

[Authority for term: OAC rule 3745-77-07(C), 40 CFR Part 64.7(d), 40 CFR Part 64.3(a), and 40 CFR Part 64.9(b)]

3. All quarterly reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit and postmarked by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 9 pursuant to OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and rule 3745-77-07(C)]

1.b Emission Limitation

Particulate emissions (as acid fumes) shall not exceed 4.7 lbs/hr.

Applicable Compliance Method

40 CFR Part 60, Appendix A, Methods 1 - 5, Method 202 and procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and rule 3745-77-07(C)]

2. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
 - 2.a The emission testing shall be conducted within 12 months of issuance of this permit.
 - 2.b The emission testing shall be conducted to demonstrate compliance with the allowable particulate emission rate in Section A.I.1. Particulate emissions shall be measured at the scrubber stack serving this emissions unit.
 - 2.c The following test method(s) shall be employed to demonstrate compliance with the allowable particulate emissions (as acid fumes) emission rate: 40 CFR Part 60, Appendix A, Methods 1 - 5, Method 202 and the procedures specified in OAC 3745-17-03(B)(1).
 - 2.d The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity of 26 TPH, unless otherwise specified or approved by the Canton local air agency.
 - 2.e Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton local air agency's refusal to accept the results of the emission test(s)
 - 2.f Personnel from the Canton local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - 2.g A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton local air agency.

[Authority for the term: OAC rule 3745-17-03(B)(1), rule 3745-17-03(B)(10) and rule 3745-77-07(C)]

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

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: #2HAP - Shot Blaster (P009)

Activity Description: Wheelabrator shot blaster operation

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P009 - #2 Hot Anneal & Pickle (HAP) Line, 8 head shot blaster dampered exhaust to either east baghouse, 3-compartment Wheelabrator L-10191, or the west 1-compartment Pangborn L-10192 (Prior BH for the shutdown P025).	OAC rule 3745-17-11	20.1 lbs/hr of particulate emissions
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See sections A.II.1., A.III.1 through A.III.6 and A.IV.2.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

[Authority for the term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 64]

III. Monitoring and/or Record Keeping Requirements

1. The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are: (a) the daily inspections for visible emissions from the baghouse exhaust stack; and (b) the daily inspection of the baghouse differential pressure reading(s).

The CAM performance indicator values were established in accordance with the manufacturer's recommendations and verified during particulate emissions testing. When any of the above performance indicators are operating outside of the indicator values, the permittee shall take corrective action 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 to comply with the reporting requirements specified in Section A.IV below.

Baghouse operating differential pressure shall be re-verified through periodic emission testing or as a result of changes to the operating conditions of the scrubber or emissions unit. In addition to VE monitoring and periodic monitoring of the baghouse operating parameters, the permittee also has an Operations and Maintenance Plan for the baghouse and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the baghouse and capture system shall be made as needed. If the current CAM indicators and/or the baghouse and capture system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(A)(3)(a), OAC rule 3745-77-07(A)(3)(b), 40 CFR Part 64.3(a), 40 CFR Part 64.6(c), 40 CFR Part 64.7(d), and 40 CFR Part 64.8]

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

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

[Authority for term: OAC rule 3745-77-07(C), and 40 CFR Part 64.6(c)]

3. The permittee shall maintain necessary parts for routine repairs of the monitoring equipment.

[Authority for term: OAC rule 3745-77-07(C) and 40 CFR 64.7(b)]

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

4. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on once-per-shift basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

The acceptable range for the pressure drop across the baghouse shall be between 3.0 to 7.0 inches of water.

Whenever the monitored value for the pressure drop deviates from the range specified above, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Canton local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[OAC rule 3745-77-07(C), rule 3745-17-07(A), rule 3745-17-11, 40 CFR 6(c), 40 CFR 64.7(b) and 40 CFR 64.3(a)(2)]

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

5. In addition to the parametric monitoring required in Section A.III.4 of this permit, the permittee shall conduct weekly visual inspections of the baghouse in accordance with the site specific Operations and Maintenance Plan. At a minimum, each baghouse compartment shall be inspected for the following:
 - a. look for proper bag seating, bag leaks and holes;
 - b. monitor baghouse and capture system operation, including the cleaning cycle performance;
 - c. check differential pressure gauge lines for clogging and blow out when necessary; and
 - d. check the baghouse hopper functions and performance.

Records of these inspections shall be kept in accordance with the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C) and 40 CFR 64.7(e)]

6. The permittee shall maintain a supply of bags, or any other parts necessary to ensure that the collection/control system will operate properly. Any worn, clogged, or broken equipment should be replaced or fixed within a reasonable timeframe.

OAC rule 3745-77-07(C) and 40 CFR Part 64

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify the following information concerning the operation of the baghouse during the operation of the emissions unit:
 - a. each period of time when the pressure drop across the baghouse was outside of the acceptable range;
 - b. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

[Authority for the term: OAC rule 3745-77-07(C), OAC rule 3745-17-07(A), OAC rule 3745-17-11, 40 CFR 67.7(d), 40 CFR 64.3(a), and 40 CFR 64.9(b)]

2. All quarterly reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit and postmarked by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

20.1 lbs/hr particulate emissions.

Applicable Compliance Method:

Methods 1 through 5 of 40 CFR Part 60, Appendix A.

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

1.b Emission Limitation:

20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)]

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

2.a The emission testing shall be conducted within 12 months after issuance of the permit.

2.b The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10). Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

2.c Particulate emission tests shall also be conducted at the inlet of the control device to determine the uncontrolled mass rate of emission for the emissions unit, for purposes of applying Figure II of OAC rule 3745-17-11. For this testing, Methods 1 through 5 of 40 CFR Part 60, Appendix A shall be employed.

2.d i. Pressure drop readings across the baghouse shall be recorded during the emissions test to re-verify the acceptable range of operation.

ii. Visible emission observations in accordance with USEPA Method 9 shall also be conducted during the emission testing.

2.e The tests shall be conducted while P009 is operating at or near its maximum capacity of 26 TPH finished steel coil, unless otherwise approved by the Canton City Health Department (CCHD), Air Pollution Control Division (APCD).

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

V. Testing Requirements (continued)

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

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

[Authority for term: OAC rule 3745-17-03(B)(1), rule 3745-17-03(B)(10) and rule 3745-77-07(C)]

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

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: #2HAP - EquAnnFce (P010)

Activity Description: gas-fired equalizer annealing furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P010 - #2 Hot Anneal & Pickle Equalizer anneal furnace, 37 MMBtu/hr heat input, natural gas-fired.	OAC rule 3745-17-11	No applicable limit See section A.I.2.a.
	OAC rule 3745-17-07	See section A.I.2.b.

2. Additional Terms and Conditions

- The steel in #2 Hot Anneal & Pickling Equalizer anneal furnace (P010) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07(A)(3)(h).

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

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: #2HAP - PreAnnFce (P011)
Activity Description: gas-fired preheat annealing 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P011 - #2 Hot Anneal & Pickling preheat anneal furnace, 25.4 MMBtu/hr heat input, natural gas-fired.	OAC rule 3745-17-11	No applicable limit See section A.I.2.a.
	OAC rule 3745-17-07	See section A.I.2.b.

2. Additional Terms and Conditions

- 2.a The steel in #2 Hot Anneal & Pickling preheat anneal furnace (P011) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- 2.b Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07(A)(3)(h).

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

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: #2CAP - Preheat 1 AnnFce (P017)

Activity Description: gas-fired No. 1 preheat annealing 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P017 - #2 Cold Anneal & Pickle #1 anneal furnace, 25.68 MMBtu/hr heat input, natural gas-fired.	OAC rule 3745-17-11	No applicable limit See section A.I.2.a.
	OAC rule 3745-17-07	See section A.I.2.b.

2. Additional Terms and Conditions

- 2.a The steel in #2 Cold Anneal & Pickle #1 Anneal furnace (P017) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- 2.b Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07(A)(3)(h).

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

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: #2CAP - Preheat 2 AnnFce (P018)
Activity Description: gas-fired No. 2 preheat annealing 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P018 - #2 Cold Anneal & Pickle #2 anneal furnace, 28.4 MMBtu/hr heat input, natural gas-fired.	OAC rule 3745-17-11	No applicable limit See section A.I.2.a.
	OAC rule 3745-17-07	See section A.I.2.b.

2. Additional Terms and Conditions

- 2.a The steel in #2 Cold Anneal furnace (P018) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- 2.b Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07(A)(3)(h).

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

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: #2CAP - Pickle Tanks (P019)
Activity Description: #2 Cold Line acid pickle tanks

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019 - #2 Cold Anneal & Pickle (CAP) Line, Pickling Tanks #1, #2, #3; with hydrogen peroxide NOx control system and Ceilcote packed-bed acid fume wet scrubber, L-11080. Line speed was increased from 135 fpm to 200 fpm maximum.	OAC rule 3745-31-05(A)(3) (PTI 15-01478 mod issued 02/19/2002)	The nitrogen oxides (NOx) emissions shall not exceed 16.68 lbs/hr and 73.06 tpy.
		The PM10 (including acid fumes) emissions shall not exceed 1.53 lbs/hr and 6.70 tpy.
		The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07(A)(1) and 3745-17-11.
	OAC rule 3745-17-11	The particulate (including acid fumes) emissions shall not exceed 1.53 lbs/hr.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.
	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See sections A.II.1, A.III.1 through A.III.8 and A.IV.1 through A.IV.2.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The emissions from this emissions unit shall be vented to the wet scrubber at all times the emissions unit is in operation.

[Authority for the term: OAC rule 3745-31-05(C) and PTI 15-01478]

2. The scrubber water supply pressure (psig) shall be continuously maintained, at all times while the emissions unit is in operation, at a value not less than 24 psig, the value established during the last compliance test of 05/28/03.

[Authority for the term: OAC rule 3745-31-05(C) and PTI 15-01478]

3. The scrubber water flow rate shall be continuously maintained at a value of not less than 225 gallons per minute at all times while the emissions unit is in operation.

[Authority for the term: OAC rule 3745-31-05(C) and PTI 15-01478]

4. Annual steel pickling production from emissions unit P019 shall not exceed 180,000 tons per year, based on a rolling, 12-month summation of the monthly steel pickling production rates.

[Authority for the term: OAC rule 3745-31-05(C) and PTI 15-01478]

III. Monitoring and/or Record Keeping Requirements

1. The CAM plan for this emissions unit has been developed for particulate emissions (as acid fumes). The CAM performance indicators for particulate/acid fume emissions when operating are: (a) the daily checks for visible particulate emissions and quarterly USEPA Method 9 opacity readings from the scrubber exhaust stack; (b) the water supply pressure and the flow rate gauge measurements to the wet scrubber; and, (c) the hydrogen peroxide (H₂O₂) injection rate into the acid pickling tank for the type 300, 400 or other series steel being processed, and when the process is being re-adjusted for a different steel series type.

The CAM performance indicator values were established in accordance with the manufacturer's recommendations and verified during particulate emissions testing. When any of the above performance indicators are outside of the indicator ranges, the permittee shall take corrective action 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 to comply with the reporting requirements specified in Section A.IV below.

Scrubber operating parameters shall be re-verified through periodic emission testing or as a result of changes to the operating conditions of the scrubber or emissions unit. In addition to VE monitoring and periodic monitoring of the scrubber operating parameters, the permittee also has an inspection/preventative maintenance program for the scrubber and capture system. Based on the results of the inspection/preventative maintenance program, repairs to the scrubber shall be made as needed. If the current CAM indicators and/or the scrubber and capture system inspection/preventative maintenance program is considered inadequate, the permittee will develop a Quality Improvement Plan.

[Authority for term: OAC rule 3745-77-07(A)(3)(a), OAC rule 3745-77-07(A)(3)(b), 40 CFR Part 64.3(a), 40 CFR Part 64.6(c), 40 CFR Part 64.7(d), and 40 CFR Part 64.8]

2. The permittee shall perform quarterly USEPA Method 9 visible emissions (VE) observations from the stack serving this emissions unit. Visible emissions shall be read by a certified VE reader using USEPA Method 9 and shall be conducted when this emissions unit is operating under conditions when the maximum emissions are generated.

[Authority for the term: OAC rule 3745-77-07(C), PTI 15-01478 and 40 CFR Part 64]

3. The permittee shall maintain necessary parts for routine repairs of the monitoring equipment.

[Authority for term: OAC rule 3745-77-07(C) and 40 CFR 64.7(b)]

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

4. The permittee shall properly operate and maintain equipment to monitor and record the water supply pressure, the water flow rate and the hydrogen peroxide injection rate while the emissions unit is in operation. The monitoring devices and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals and/or as established by reference to previous stack testing conditions.

The permittee shall collect and record the following information:

- a. the scrubber water supply pressure, in psig, on a once-per-shift basis;
- b. the scrubber water flow rate, in gpm, on a once-per-shift basis;
- c. the hydrogen peroxide (H₂O₂) injection rate, in gph, when changing production steel type process from one type series steel to another, e.g. from 300 series to 400 series, from 400 series to another series, etc... type series steel pickling, and at least once every 8-hour shift when operating; and
- d. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

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

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

e. The scrubber water supply pressure shall be continuously maintained at all times while the emissions unit is in operation at a value of not less than 24.0 psig, the value established during a compliance test of 05/28/03, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

f. The scrubber water flow rate shall be continuously maintained at all times while the emissions unit is in operation at a value of not less than 225 gallons per minute, or as established during the most recent performance test that demonstrated the emissions unit was in compliance.

g. The hydrogen peroxide injection rate shall be continuously maintained, at all times for NO_x control while the emissions unit is in operation, at a value not less than 5.0 gallons per hour (gph) for 300 series steel and not less than 7 gph for 400 series steel, into tank #2 recirculation, established during the most recent compliance test of 05/28/03.

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

[Authority for term: [Authority for term: OAC rule 3745-77-07(C), PTI 15-01478, 40 CFR 64.6(c), 40 CFR 64.7(A)(10), 40 CFR 64.7(b) and 40 CFR Part 64.3(a)(2)]

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

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

[Authority for the term: OAC rule 3745-77-07(C), PTI 15-01478 and 40 CFR Part 64.6(c)]

6. The permittee shall maintain monthly records of the following information:
- steel pickling production rate in tons per month, including breakdown by steel series type; and
 - the rolling, 12-month summation in tons of the monthly steel pickling production rates, including breakdown by steel series types.

[Authority for the term: OAC rule 3745-77-07(C), PTI 15-01478, and 40 CFR Part 64.6(c)]

7. In addition to the parametric monitoring required in Section A.III.4 of this permit, the permittee shall conduct visual inspections of the scrubber's spray nozzles every six (6) months. At a minimum, each spray nozzle shall be inspected for the following:
- look for excessive wear, or clogging of each spray nozzle; and
 - determination of the directional output of the spray nozzle's (i.e. are the nozzle's spraying in a manner that ensures that the spray is covering the entire gas stream).

Records of these inspections shall be kept in accordance with the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(C) and 40 CFR 64.7(e)]

8. The permittee shall maintain a supply of replacement nozzles, or any other parts necessary to ensure that the scrubbing system will operate properly. Any worn, or clogged nozzles shall be replaced, or fixed during the inspection.

[Authority for term: OAC rule 3745-77-07(C) and 40 CFR 64.7(e)]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

[Authority for term: OAC rule 3745-77-07(C), 40 CFR Part 64.9]

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
 - a. each period of time when the scrubber water supply pressure was below the acceptable value;
 - b. each period of time when the scrubber water flow rate was below the acceptable value;
 - c. each period of time when the hydrogen peroxide (H₂O₂) injection rate was not maintained at or above the required level;
 - d. each exceedance of the maximum allowable, rolling, 12-month steel pickling production limitation;
 - e. an identification of each incident of deviation described in (a) through (d) above where a prompt investigation was not conducted;
 - f. an identification of each incident of deviation described in (a) through (d) above where prompt corrective action, that would bring the water supply pressure, the scrubber water flow rate, hydrogen peroxide (H₂O₂) injection rate and/or production limitation into compliance with the acceptable value, was determined to be necessary and was not taken;
 - g. an identification of each incident of deviation described in (a) through (d) where proper records were not maintained for the investigation and/or the corrective action.

[Authority for term: OAC rule 3745-77-07(C), 40 CFR Part 64.7(d), 40 CFR Part 64.3(a), and 40 CFR Part 64.9(b)]

3. All quarterly reports shall be submitted to Canton local air agency in accordance with paragraph A.1.c of the General Terms and Conditions of this permit and postmarked by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

V. Testing Requirements

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

- 1.a Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 9 pursuant to OAC rule 3745-17-03 (B)(1).

[Authority for term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)]

- 1.b Emission Limitations:

The nitrogen oxides (NO_x) emissions shall not exceed 16.68 lbs/hr and 73.06 tpy.

Applicable Compliance Method:

Compliance with the lbs/hr emission limitation shall be based on the emission testing specified in section A.V.2 using 40 CFR Part 60, Appendix A, Method 7E.

The annual limit of 73.06 tpy is based on the following equation:

$16.68 \text{ lbs/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2,000 \text{ lbs}$

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

V. Testing Requirements (continued)

1.c Emission Limitation:

The particulate (including acid fumes) emissions shall not exceed 1.53 lbs/hr.

Applicable Compliance Method

40 CFR Part 60, Appendix A, Methods 1-5 and Method 202. For nitric acid fumes Method 5319 of the OSHA/NIOSH with Ohio EPA approval.

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

1.d Emission Limitations:

The PM10 (including acid fumes) emissions shall not exceed 1.53 lbs/hr and 6.70 tpy.

Applicable Compliance Method

Compliance with the lbs/hr emission limitation shall be based on the emission testing specified in section A.V.2 using 40 CFR Part 60, Appendix A, Methods 1-4, Method 201 & 202 and for nitric acid fumes, Method 5319 of the OSHA/NIOSH with Ohio EPA approval.

The annual limit of 6.70 tpy is based on the following equation:
 $1.53 \text{ lbs/hr} \times 8,760 \text{ hrs/yr} \times 1 \text{ ton}/2,000 \text{ lbs}$

[Authority for the term: OAC rule 3745-17-03(B)(1) and OAC rule 3745-77-07(C)]

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

2.a The emission testing shall be conducted within 6 months after issuance of this permit, and again approximately 6 months prior to the date of permit expiration.

2.b The emission testing shall be conducted to demonstrate compliance with the allowable particulate/PM10 and NOx emission rates in Section A.I.1. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

2.c The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate:

i. for particulate (including acid fumes) emissions, 40 CFR Part 60, Appendix A, Methods 1 - 5, Methods 201 and 202, and the procedures specified in OAC rule 3745-17-03 (B)(10). For nitric acid fumes: Method 5319 of OSHA/NIOSH with Ohio EPA approval.

ii. for PM10 (including acid fumes) emissions, 40 CFR Part 60, Appendix A, Methods 1 - 4, Methods 201 & 202.

Particulate/PM10 emissions shall be measured at the stack serving this emissions unit.

iii for NOx emissions, 40 CFR Part 60, Appendix A, Method 7E.

2.d The test(s) shall be conducted while the emissions unit is operating under conditions producing the maximum NOx, and/or at the maximum capacity of 44 TPH, unless otherwise specified or approved by the Canton local air agency.

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

V. Testing Requirements (continued)

- 2.f** Personnel from the Canton local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- 2.g** A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Canton local air agency.

[Authority for the term: OAC rule 3745-17-03(B)(1), rule 3745-17-03(B)(10) and rule 3745-77-07(C)]

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

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: #2CAP - EquAnnFce (P024)

Activity Description: gas-fired equalizer annealing furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P024 - #2 Cold Anneal & Pickle Equalizer Anneal Furnace, 12.22 MMBtu/hr heat input, natural gas-fired.	OAC rule 3745-17-11	No applicable limit See section A.I.2.a.
	OAC rule 3745-17-07	See section A.I.2.b.

2. Additional Terms and Conditions

- The steel treated in the preheat furnace (P024) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07(A)(3)(h).

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

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

THIS IS THE LAST PAGE OF THE PERMIT

Statement of Basis For Title V Permit

Part I - General	
Company Name	Jewel Acquisition LLC (prior J&L Specialty Steel, Inc.)
Premise Number	15-76-00-0378
What makes this facility a Title V facility?	Major for NOx emissions.
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)	See explanation of changes below.

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15-76-00-0378
Title V Renewal - Explanation of Changes.

Background

J&L Specialty Steel, Inc. was purchased on June 1, 2004 by Jewel Acquisition LLC (subsidiary of ATI Allegheny Ludlum). Many of the facility EU's were idled and/or shutdown due to business downturn. Only nine (9) non-insignificant emissions units are currently operational based upon FCE inspection on 06/20/07. The F002 "dirt roadways" section of the facility were not included in the purchase.

Four (4) small package boilers (B003, B004, B005, and B006) were installed, and the larger boilers B001 and B002 were permanently shutdown. The # 1 Cold Anneal Pickle (CAP) line and the # 1 Hot Anneal Pickle (HAP) Line were shutdown, leaving only the # 2 CAP Line and the # 2 HAP Line.

CAM now applies for three (3) emissions units: P005, P009 and P019.

Facilitywide

Many of the Part II.B. IEU's that were trivial or shutdown were deleted. Some of the Part II.B. IEU's with applicable federal regulations were moved to the Part II.A. State and Federally Enforceable Section.

P026 - bright anneal furnace, NG fired, 14.7 MMBtu/hr unit with low NOx burners, PTI 15-1269 was discovered missing as P026 in the facility Title V Application; however was found as a de minimus IEU Z121 in Part II.B. in the initial Title V permit. P026 has been added to Part II.A.3., Federally Enforceable Requirements.

P005, P009 and P019

Updated and corrected the Operations, Property, and/or Equipment descriptions and added the 40 CFR Part 64 CAM plan to each of these emissions units.

P019 testing updated to measure particulate (including acid fumes CPM). Added test Methods 201 and 202 for PM10 measurement.

Added the authorities for each term and condition for all emissions units.

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1.		40 CFR 64	Compliance Assurance Monitoring (CAM) requirements apply to P005, P009, and P019.
A.2.	25-03		Emergency episode plan requirement
A.3.	77-07 (A)(13)		Identification of IEUs with applicable requirements.

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												
F002	No VE's RACM	17-07 (B)(4) 17-07 (B)(5) 17-08 (B)(8) 17-08 (B)(2)		N	N	Y	N	N	Y	N	N	N	Y	NA	OR - None required to demonstrate compliance Rp - Records available for inspection upon request
P010 P011 P017 P018 P024	No applicable limitation	17-11 17-07(A)		Y	N	N	N	N	N	N	N	N	N	NA	Five (5) anneal furnaces, inherently clean EU's

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P019	20% Opacity 1.53 lbs/hr PE & fumes 16.68 lbs/hr NOx 1.53 lbs/hr PM10 & fumes	17-07(A) 17-11	 31-05 (A)(3) 31-05 (A)(3) 40 CFR Part 64	N	Y	Y	N	N	Y	N	Y	N	Y	N	BAT requirement to reduce NOx emissions OR - steel production limited, scrubber parametric limits and hydrogen peroxide injection rate, NOx control, limits CAM is applicable; M, R & Rp are specified.
P019	6.7 tons PE/ yr 73.06 tons NOx / yr 6.7 tons PM10/ yr	17-11	 31-05 (A)(3) 31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	Note: The tons/yr limitations were developed by multiplying the lbs/hr limitation by 8,760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
P005	20% Opacity 4.7 lbs/hr PE & fumes 20.6 tons PE/ yr	17-07(A) 17-11 17-11	40 CFR Part 64	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - scrubber parametric limits of supply pressure and flow CAM is applicable; M, R, & Rp are specified. Note: The tons/yr limitations were developed by multiplying the lbs/hr limitation by 8,760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.
P009	20% Opacity 20.1 lbs/hr PE	17-07(A) 17-11	40 CFR Part 64	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - baghouse differential pressure maintained within limits CAM is applicable; M, R, & Rp are specified.

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.