

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.