



State of Ohio Environmental Protection Agency

Street Address:

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

11/30/01

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-51-01-0017
Marion Steel Company
Scott D. Conway
912 Cheney Avenue
Marion, OH 43301-1801

Dear Scott D. Conway:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

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 or comments concerning this draft Title V permit, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA (electronically submitted)
File, DAPC PMU
Northwest District Office



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 11/30/01	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 03-51-01-0017 to:
Marion Steel Company
 912 Cheney Avenue
 Marion, OH 43301-1801

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

F001 (Vehicular Traffic) Truck traffic on plant roads	P004 (Continuous Caster) Continuous casting of steel into billets	P903 (Elec. Arc Furnace #3) Scrap steel melting
K002 (Sign Post Paint Line) Painting steel sign posts	P009 (Rolling Mill) Steel rolling mill including reheat furnace	

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 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to

the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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.

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.

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 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.

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.

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 appropriate Ohio EPA District Office or local air agency 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 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.

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.

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).

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.

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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and
- 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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

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.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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.

4. 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.

5. 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).

6. 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.

7. 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.

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

P005-ladle preheat furnaces, P007-tundish preheat furnaces, Z004-hand torches, Z006-degreasing, Z007-stenciling, Z008-welding, Z009-lime load-out, Z012-standby generator, Z013-lime load-in, and Z014-scrap piles.

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 a Permit to Install (PTI) for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Vehicular Traffic (F001)
Activity Description: Truck traffic on plant roads

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paved and unpaved roadways and parking areas	OAC rule 3745-17-07(B)	none (See A.I.2.a.)
	OAC rule 3745-17-08(B)	none (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.b This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: Sign Post Paint Line (K002)
Activity Description: Painting steel sign posts

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>
sign post paint line	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs volatile organic compounds (VOC)/gallon of coating, excluding water exempt solvents
	OAC rule 3745-31-05 (PTI #03-9114)	325.68 lbs VOC/day from coatings and cleanup materials, 59.44 TPY VOC from coatings and cleanup materials
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c).

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the VOC content of each coating and cleanup material employed, in lbs/gallon (excluding water and exempt solvents), as applied;
 - c. the volume (in gallons, excluding water and exempt solvents) of each coating and cleanup material employed;
 - d. the VOC emission rate from each coating and cleanup material employed (b x c); and
 - e. the total VOC emission rate from all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials).

(If the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the date the deviation occurred.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily VOC emission limitation of 325.68 pounds. The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - 1.a Emission Limitation: 3.5 lbs VOC/gallon of coating, excluding water exempt solvents

Applicable Compliance Method: Compliance with the VOC content restriction above shall be based upon the record keeping requirements specified in section A.III.1. of this permit. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings.
 - 1.b Emission Limitation: 325.68 lbs VOC/day from coatings and cleanup materials

Applicable Compliance Method: Compliance with the daily allowable VOC emission limitation shall be based on the record keeping requirements specified in A.III.1 of this permit.
 - 1.c Emission Limitation: 59.44 TPY VOC from coatings and cleanup materials

Applicable Compliance Method: The annual emission limitation was determined by multiplying the daily emission limitation by 365, and then dividing by 2000. Therefore, as long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

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: Continuous Caster (P004)
Activity Description: Continuous casting of steel into billets

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
continuous caster, with baghouse	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Marion County.
- 2.c All particulate emissions from this emissions unit shall be vented to the baghouse.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<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: Rolling Mill (P009)
Activity Description: Steel rolling mill including reheat furnace

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
130 mmBtu/hr, natural gas-fired reheat furnace including, a rolling mill	OAC rule 3745-17-07(A)	None (See A.I.2.a.)
	OAC rule 3745-17-07(B)	None (See A.I.2.b.)
	OAC rule 3745-17-08(B)	None (See A.I.2.c.)
	OAC rule 3745-17-11(B)	None (See A.I.2.d.)
	OAC rule 3745-18-06(E)	638.6 lbs of sulfur dioxide (SO ₂)/hr (See A.I.2.e.)
	OAC rule 3745-31-05 (PTI #03-3077)	17.47 lbs of nitrogen oxides (NO _x)/hr, 73.38 TPY NO _x
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-18-06(E).

2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- 2.c This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.d The uncontrolled mass rate of particulate emissions from this emissions unit (from the stacks) is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table 1 does not apply because the facility is located in Marion County.
- 2.e The actual SO₂ emissions from this emissions unit are negligible because the combustion of natural gas is the only source of these emissions (the combustion of natural gas produces negligible amounts of SO₂ emissions).

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type of fuel burned in this emissions unit.
2. The permittee shall maintain monthly records of (a) the total hours of operation of this emissions unit and (b) the NOx emissions (in tons per month and total tons, to date, for the calendar year) from this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit annual reports that specify the total NOx emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

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

1.a Emission Limitation: 638.6 lbs SO₂/hr

Applicable Compliance Method: Compliance with the hourly allowable SO₂ emission limitation shall be assumed as long as natural gas is the only fuel combusted in this emissions unit.

1.b Emission Limitation: 17.47 lbs NO_x/hr, 73.38 TPY NO_x

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the hourly allowable NO_x emission limitation in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance with the annual limitation above shall be based upon the record keeping requirements specified in section A.III.2 of this permit. The NO_x emissions from this emissions unit shall be calculated by multiplying the hours of operation times the average hourly emission rate documented during the latest valid NO_x emission test for this emissions unit (using USEPA Methods 1 through 4 and 7 of 40, CFR, Part 60, Appendix A).

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in 1988 without going through the proper "Major New Source Review" permitting requirements (required pursuant to Title 40 of the Code of Federal Regulations, Part 52.21). [Emission testing during August of 2001 has shown that the emissions unit cannot comply with the NO_x emission limitations of 17.47 lbs/hr and 73.38 TPY.] Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete PSD permit to install application and, if necessary, a compliance plan and schedule for any required control equipment, within one month following the issuance of this permit.

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: Elec. Arc Furnace #3 (P903)
Activity Description: Scrap steel melting

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
electric arc furnace (EAF) #3, with 2 baghouses	OAC rule 3745-17-07(A)	See A.I.2.a.
	OAC rule 3745-17-07(B)	None (See A.I.2.b.)
	OAC rule 3745-17-08(B)	None (See A.I.2.c.)
	OAC rule 3745-17-11(B)	See A.I.2.d.
	OAC rule 3745-18-06(E)	491.8 lbs of sulfur dioxide (SO ₂)/hr
	OAC rule 3745-31-05 (PTI #03-3928)	8.36 lbs of particulate emissions (PE)/hr, 36.62 TPY PE
		24.13 TPY PM ₁₀
		0.2 lb of nitrogen oxides (NO _x)/ton steel produced, 46.43 TPY NO _x
	0.9 lb of carbon monoxide (CO)/ton steel produced, 116.07 TPY CO	
	40 CFR, Part 60, Subpart AAa	The requirements of this rule also include compliance with the requirements of OAC rule 3745-18-06(E) and 40 CFR, Part 60, Subpart AAa.
	OAC rule 3745-15-07	See A.I.2.e and f.
		0.024 lb of mercury (Hg)/hr, 0.11 TPY Hg (See A.I.2.g.)

2. Additional Terms and Conditions

- 2.a** The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to 40 CFR, Part 60, Subpart AAa.
- 2.b** This emissions unit is exempt from the visible emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

2. Additional Terms and Conditions (continued)

- 2.c** This facility is not located within an "Appendix A" area identified in OAC rule 3745-17-08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.d** The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to 40 CFR, Part 60, Subpart AAa.
- 2.e** The permittee shall not cause to be discharged into the atmosphere gases from the electric arc furnace (EAF) which:
- i. exit from the baghouse and contain PE in excess of 12 milligrams (mg)/dry standard cubic meter (dscm) [0.0052 gr/dscf];
 - ii. exit from the baghouse and exhibit 3 percent opacity or greater, as a 6-minute average; and
 - iii. exit from the shop [the building housing one or more EAFs and/or argon-oxygen decarbonization (AOD) vessels] and, due solely to the operations of any affected EAF or AOD vessel(s), exhibit 6 percent opacity or greater, as a 6-minute average.
- 2.f** The permittee shall not cause to be discharged into the atmosphere from the dust handling system any gases which exhibit 10 percent opacity or greater, as a 6-minute average.
- 2.g** These emission limitations were established to ensure that the Hg emissions from this emissions unit do not pose a threat to public health, in violation of OAC rule 3745-15-07.

II. Operational Restrictions

1. The maximum pressure in the free space inside the EAF and the control system's fan motor amperes range, when the EAF is operating in the meltdown and refining periods, shall not exceed the levels established during the most recent emission testing that demonstrated the emissions unit was in compliance.
2. The pressure drop across baghouse #1 and #2 shall be maintained in the ranges of 2 to 4 inches of water and 4 to 6 inches of water, respectively, while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. In lieu of installing a continuous monitoring system for measurement of opacity, observations of the opacity of the visible emissions (VEs) from the baghouses shall be performed by a certified VE observer as follows:
 - a. The VE observations for each baghouse serving this emissions unit shall be conducted in accordance with Method 9 of 40 CFR, Part 60, Appendix A.
 - b. The VE observations shall be conducted at least once per day while the furnace is operating in the melting and refining period.
 - c. The VEs shall be taken for at least three 6-minute periods. The opacities shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6-minute observations shall be required. In this case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause or location of visible emissions observed during a single incident.
 - d. The permittee shall maintain copies of all daily opacity observations required above. The records shall identify the persons responsible for conducting the readings and verify that their Method 9 certifications are up-to-date.

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

2. The permittee shall check and record on a once-per-shift basis the furnace static pressure, in inches of water, and either: (a) check and record the control system fan motor amperes and damper positions on a once-per-shift basis; (b) install, calibrate, operate and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or (c) install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and check and record damper positions on a once-per-shift basis. The monitoring devices may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result. The flow rate monitoring devices shall have an accuracy of +/-10 percent over their normal operating range and shall be calibrated according to the manufacturer's instructions. The permittee may be required to demonstrate the accuracy of the monitoring devices relative to Methods 1 and 2 of Appendix A of 40 CFR Part 60.
3. When the permittee is required to demonstrate compliance with the VE limitation in section A.1.2.e.iii. and at any other time, the Director (the appropriate Ohio EPA District Office or local air agency) may require that either the control system fan motor amperes and all damper positions, or the volumetric flow rate through each separately ducted hood, or the volumetric flow rate at the control device inlet and all damper positions shall be determined during all periods in which a hood is operated for the purpose of capturing emissions.

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

4. The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture systems (i.e., pressure sensors, dampers, and damper switches). These inspections shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion. Any deficiencies shall be recorded and proper maintenance performed. The permittee may petition the Director (the appropriate Ohio EPA District Office or local air agency) to approve any alternative to monthly operational status inspections that will provide a continuous record of the operation of each emission capture system.
5. The permittee shall calibrate, operate and maintain monitoring devices that allow the pressure in the free space inside the EAF to be monitored. The monitoring devices may be installed in any appropriate location in the EAF's ducts prior to the introduction of ambient air such that reproducible results will be obtained. The pressure monitoring devices shall have an accuracy of +/-5 mm of water gauge over their normal operating range and shall be calibrated according to the manufacturer's instructions.
6. Except as provided for in section A.III.7, when the permittee of an EAF controlled by a direct-shell evacuation control (DEC) system is required to demonstrate compliance with the VE limitation in section A.1.2.e.iii, and at any other time the Director (the appropriate Ohio EPA District Office or local air agency) may require, the pressure in the free space inside the furnace shall be determined during the meltdown and refining period(s) using the monitoring device required pursuant to section A.III.5 above. The permittee may petition the Director (the appropriate Ohio EPA District Office or local air agency) for reestablishment of the pressure whenever the permittee can demonstrate to the the Director's (the appropriate Ohio EPA District Office's or local air agency's) satisfaction that the EAF operating conditions upon which the pressures were previously established are no longer applicable. The pressure determined during the most recent demonstration of compliance shall be maintained at all times when the EAF is operating in a meltdown and refining period. Operation at higher pressures may be considered by the Director (the appropriate Ohio EPA District Office or local air agency) to be unacceptable operation and maintenance of the affected facility.

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

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

The permittee shall maintain daily records of all shop opacity observations.

8. The permittee shall properly operate and maintain equipment to monitor the pressure drops across the baghouses while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drops across the baghouses on a once per shift basis.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which the opacity limitation for the baghouses was exceeded and (b) describe any corrective actions taken to eliminate the opacity exceedances. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all periods of time during which the static pressures in the free space inside the furnace exceeded the values in section A.II.1 of this permit;
 - b. all periods of time during which any of the control system fan motor ampere values were outside the ranges in section A.II.1 of this permit; and
 - c. all periods of time during which the hoods and/or the baghouse were operated at volumetric flow rates lower than those established in section A.III.3 of this permit.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the shop opacity observations were in excess of the limit specified in section A.I.2.e.iii of this permit.
4. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop(s) across either or both of the baghouses did not comply with the allowable range(s) specified in section A.II.2 of the terms and conditions of this permit.
5. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for PE, NO_x, CO, SO₂, and Hg.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for PE, Method 5D of 40 CFR, Part 60, Appendix A; for NO_x, Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A; for SO₂, Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A; and for Hg, Methods 1 through 4 and 29 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

3. The permittee shall determine compliance with the PE limitations in condition A.I.1 as follows:
 - a. Method 5D shall be used for positive-pressure fabric filters to determine the PE concentration and volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least 4 hours and 4.50 dscm (160 dscf) and the sampling time shall include an integral number of heats.
 - b. The test runs shall be conducted concurrently, unless inclement weather interferes.
4. During the PE runs, the permittee shall obtain the following additional information:
 - a. The pressure in the free space inside the furnace shall be determined during the melting and refining period(s) using the monitoring devices required under condition III.5.
 - b. The control system fan motor amperes and all damper positions or the volumetric flow rate through each separately ducted hood shall be determined during all periods in which a hood is operated for the purpose of capturing emissions from the EAF.
5. During performance tests, the permittee shall not add gaseous diluents to the effluent gas stream after the fabric in any pressurized fabric filter collector, unless the amount of dilution is separately determined and considered in the determination of emissions.
6. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

6.a Emission Limitation: 491.8 lbs SO₂/hr

Applicable Compliance Method: Compliance with the hourly SO₂ limitation above shall be based on the results of emission testing conducted in accordance with Methods 1 through 4 and 6 of 40 CFR, Part 60, Appendix A.

6.b Emission Limitations: 8.36 lbs PE/hr, 36.62 TPY PE

Applicable Compliance Method: Compliance with the hourly PE limitation above shall be based on the results of emission testing conducted in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

The TPY limitation was developed by multiplying the lb/hr limitation by 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, compliance with the annual limitation will be ensured if compliance with the hourly limitation is maintained.

6.c Emission Limitation: 24.13 TPY PM₁₀

Applicable Compliance Method: The permittee may demonstrate compliance with the annual limitation above by multiplying the company supplied emission factor of 13 lb PM/ton steel produced, by 0.8 (80% is assumed to be PM₁₀), 53 tons/hr, a control efficiency of 99% (1-0.99), and 8760 hrs/yr, and then dividing by 2000 lbs/ton.

6.d Emission Limitations: 0.2 lb NO_x/ ton steel produced, 46.43 TPY NO_x

Applicable Compliance Method: Compliance with the NO_x emission limitation above shall be based on the results of emission testing conducted in accordance with Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

The TPY limitation was developed by multiplying the lb NO_x/ton steel produced limitation, by 53 tons/hr and 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, compliance with the annual limitation will be ensured if compliance with the lb NO_x/ton steel produced limitation is maintained.

6.e Emission Limitation: 0.9 lb CO/ton steel produced, 116.07 TPY CO

Applicable Compliance Method: Compliance with the CO emission limitation above shall be based on the results of emission testing conducted in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

The TPY limitation was developed by multiplying the lb CO/ton steel produced limitation, by 53 tons/hr and 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, compliance with the annual limitation will be ensured if compliance with the lb CO/ton steel produced limitation is maintained.

6.f Emission Limitation: 0.0052 gr PE/dscf

Applicable Compliance Method: Compliance with the PE limitation above shall be based on the results of emission testing conducted in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

6.g Emission Limitation: 3% opacity, from the exits of the EAF baghouses

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

Emission Limitation: 6% opacity, from the exits fo the melt shop due solely to the operation of the EAF

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

6.h Emission Limitation: 10% opacity, from the dust handling system after the performance test is conducted

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

V. Testing Requirements (continued)

6.j Emission Limitations: 0.024 lb Hg/hr, 0.11 TPY Hg

Applicable Compliance Method: Compliance with the hourly Hg limitation above shall be based on the results of emissions testing conducted in accordance with Methods 1 through 4 and 29 of 40 CFR, Part 60, Appendix A.

The TPY limitation was developed by multiplying the lb/hr limitation by 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, compliance with the annual limitation will be ensured if compliance with the hourly limitation is maintained.

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in 1998 without going through the proper "Major New Source Review" permitting requirements (required pursuant to Title 40 of the Code of Federal Regulations, Part 52.21). [Emission testing during July of 1999 has shown that the emissions unit cannot comply with the established CO emission limitation.] Therefore, as the initial step for this emissions unit to achieve compliance with the applicable requirements, the permittee shall submit a complete PSD permit to install application within one month following the issuance of this permit.

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

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