



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

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

Mailing Address:

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

06/08/00

**CERTIFIED MAIL**

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

15-76-05-0694  
RepublicTechnologies International, LLC - 8th Street  
Eric D. Howland  
2633 8th Street NE  
Canton, OH 44704

Dear Eric D. Howland:

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.

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 Canton Division of Air Pollution Control.**

Very truly yours,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive, slightly slanted style.

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

cc: USEPA  
Jim Orlemann, DAPC Engineering  
Michael Ahern, DAPC PMU  
Canton Division of Air Pollution Control  
Pennsylvania  
West Virginia



## Ohio EPA

State of Ohio Environmental Protection Agency

### TITLE V PERMIT

Issue Date: 06/08/00

**DRAFT**

Effective Date:

Expiration Date:

This document constitutes issuance to:

RepublicTechnologies International, LLC - 8th Street  
2633 Eighth Street NE  
Canton, OH 44704

of a Title V permit for Facility ID: 15-76-05-0694

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

B001 (Boiler #1)  
Steam generation

B002 (Boiler #2)  
Steam generation

F001 (Roadways and Parking Areas)  
Vehicular Traffic on Plant Roadways and Parking Areas

F003 (Conventional Teeming)  
Conventional teeming in #3 and #4 melt shops

P005 (Ingot Inoculation - Aisle #4)  
Ingot Lead Inoculation Aisle #4 - #4 Melt Shop

P006 (12" Mill No. 1 Furnace)  
Billet reheating furnace

P007 (12" Mill No. 2 Furnace)  
Billet reheating furnace

P008 (Soaking Pit Block #1)  
Steel Ingot Heating Soaking Pit

P009 (Soaking Pit Block #2)  
Steel Ingot Heating Soaking Pit

P010 (Soaking Pit Block #3)  
Steel Ingot Heating Soaking Pit

P011 (Soaking Pit Block #4)  
Steel Ingot Heating Soaking Pit

P013 (Soaking Pit Block #6)  
Steel Ingot Heating Soaking Pit

P014 (Soaking Pit Block #7)  
Steel Ingot Heating Soaking Pit

P015 (Soaking Pit Block #8)  
Steel Ingot Heating Soaking Pit

P016 (Soaking Pit Block #9)  
Steel Ingot Heating Soaking Pit

P037 (No. 2 Roller Hearth Quench Furnace)  
Steel heat treating furnace

P061 (#4 Steel Conditioning Torch Cutting)  
Torch cutting machine for specialty ingots

P064 (AOD Vessel #3 Melt Shop)  
100 Ton Salem Corp. Argon/Oxygen Decarburization Vessel

P068 (#3 & #4 Melt Shops Lime and Alloy Transfer)  
Lime and alloy transfer and conveying system

P070 (#4 Grinder at #5 Steel Conditioning)  
Steel billet grinder

P071 (#5 Grinder at #5 Steel Conditioning)  
Steel billet grinder

P074 (#10 Grinder at #5 Steel Conditioning)  
Steel billet grinder

P076 (#12 Grinder at #5 Steel Conditioning)  
Steel billet grinder

P078 (#14 Grinder at #5 Steel Conditioning)  
Steel billet grinder

P081 (#1 Round Grinder at #4 Steel Conditioning)  
Steel Grinder

P082 (#2 Slab Grinder at #4 Steel Conditioning)  
Steel Slab Grinder

P083 (#3 Slab Grinder at #4 Steel Conditioning)  
Steel Slab Grinder

P094 (Car Type Box Anneal/Temp #3)  
Steel annealing/tempering furnace

P095 (Car Type Box Anneal/Temp #4)  
Steel annealing/tempering furnace

P096 (Car Type Box Anneal/Temp #5)  
Steel annealing/tempering furnace

P099 (Car Type Box Anneal/Temp #8)  
Steel annealing/tempering furnace

P101 (Car Type Box Anneal/Temp #10)  
Steel annealing/tempering furnace

P104 (Car Type Box Anneal/Temp #16)  
Steel annealing/tempering furnace

P106 (LRS #4 Melt Shop)  
Ladle Metallurgy/Refining Station in #4 Melt Shop

P118 (Ingot Inoculation - Aisle #1)  
Ingot inoculation at No. 1 platform

P123 (CRP - Ladle Metallurgical Facility (LMF))  
Ladle Metallurgical Facility

P126 (CRP - Reheat Furnace)  
Natural Gas fired reheat furnace and rolling mill

P128 (CRP - Alloy Truck Dumping)  
Alloy Truck Dumping

P129 (CRP - Alloy Conveying and Silos)  
Alloy Conveying and Silos

P902 (#4 EAF - #3 Melt Shop)  
Electric arc steel making furnace

P903 (#5 EAF - #3 Melt Shop)  
Electric arc steel making furnace

P904 (#6 EAF - #4 Melt Shop)  
Electric arc steel making furnace

P905 (#7 EAF - #4 Melt Shop)  
Electric arc steel making furnace

P907 (#9 EAF - #4 Melt Shop)  
Electric arc steel making furnace

Z001 (#3 Melt Shop Ladle Dryers/Preheaters)  
Natural gas fired ladle dryer/preheater stands

Z002 (#4 Melt Shop Ladle Dryers/Preheaters)  
Natural gas fired ladle dryer/preheater stands

Z003 (AOD Vessel Preheater)  
Natural gas fired AOD vessel preheater

Z027 (No. 3 Melt Shop Stir Station)  
Argon stir station

Z028 (No. 4 Melt Shop Bubble Station)  
Argon bubble station

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:

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

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

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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.

## **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:

F002 - plant storage piles  
F005 - melt shop slag handling  
F006 - melt shop baghouse dust handling  
G001 - gasoline and diesel sources  
K001 - paint booth - electric repair  
L001 - S-K unit cleaner #34  
L002 - S-K unit cleaner #35  
L003 - S-K unit cleaner #41  
L005 - S-K unit cleaner #68  
L006 - S-K unit cleaner #69  
L008 - S-K unit cleaner #76  
L012 - S-K unit cleaner #25  
L015 - S-K unit cleaner #30  
L020 - S-K unit cleaner #39  
L021 - S-K unit cleaner #40  
L022 - S-K unit cleaner #43  
L023 - S-K unit cleaner #44  
L024 - S-K unit cleaner #45  
L026 - S-K unit cleaner #48  
L028 - S-K unit cleaner #50  
L031 - S-K unit cleaner #71  
L032 - S-K unit cleaner #72  
L033 - S-K unit cleaner #73  
L035 - S-K unit cleaner #75  
L036 - S-K unit cleaner #80  
L037 - S-K unit cleaner #114  
L039 - S-K unit cleaner #117  
L040 - S-K unit cleaner #118  
L041 - S-K unit cleaner #119  
L042 - S-K unit cleaner #120

**B. State Only Enforceable Section (continued)**

L043 - S-K unit cleaner #N&T  
L044 - S-K unit cleaner #51  
L046 - S-K unit cleaner #200  
L049 - S-K unit cleaner #203  
L050 - S-K unit cleaner #204  
L051 - S-K unit cleaner #205  
L052 - S-K unit cleaner #207  
L053 - S-K unit cleaner #208  
L054 - S-K unit cleaner #209  
L055 - S-K unit cleaner #210  
P034 - ball bottom anneal furnace #1  
P036 - bar coil pickle 1 & 2  
P039 - #1 forge furnace  
P054 - met lab fume hood #1 East  
P055 - met lab fume hood #1 North  
P066 - no. 22 coil heat treat furnace  
P085 - ball bottom anneal furnace #2  
P086 - ball bottom anneal furnace #3  
P087 - ball bottom anneal furnace #4  
P088 - ball bottom anneal furnace #5  
P089 - ball bottom anneal furnace #6  
P090 - ball bottom anneal furnace #7  
P091 - ball bottom anneal furnace #11  
P092 - ball bottom anneal furnace #12  
P093 - ball bottom anneal furnace #13  
P097 - car type box anneal/tempering #6  
P098 - car type box anneal/tempering #7  
P100 - car type box anneal/tempering #9  
P105 - atmospheric annealing furnace  
P108 - #2 test furnace  
P109 - #3 forge furnace  
P110 - #4 forge furnace  
P111 - #2 anneal furnace  
P112 - #1 tool furnace

**B. State Only Enforceable Section (continued)**

P113 - #2 tool furnace  
P114 - #1 mech HT furnace  
P115 - #2 mech HT furnace & #2 draw furnace  
P116 - #3 test furnace  
P119 - met lab fume hood - etch house  
P120 - met lab fume hood #1 East (South)  
P121 - met lab fume hood 3rd floor  
P122 - #1 draw furnace  
P124 - CRP - vacuum tank degasser (VTD)  
P125 - continuous caster area  
P127 - CRP - sample grinder  
P145 - torch cutoff  
P150 - Tundish preheater #1  
P151 - Tundish preheater #2  
P908 - truck dumping  
Z004 - scrap preparation torch cutting  
Z006 - spray painting  
Z007 - #2 draw test furnace  
Z008 - blacksmith oil quench  
Z009 - bar finish oil dip tank  
Z010 - 20" shipping oil dip tank  
Z013 - test saw  
Z016 - shot blasting at open hearth  
Z017 - blast unit - met lab

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 for the emissions unit.

## Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler #1 (B001)  
**Activity Description:** Steam generation

### 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>
boiler #1, Babcock and Wilcox model FM, 170 mmBtu/hr, fired with natural gas	OAC rule 3745-17-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb of particulate emissions per mmBtu of actual heat input
	OAC rule 3745-18-06(A)	See A.I.2.a below.

#### 2. Additional Terms and Conditions

- 2.a This emissions unit is not subject to any emission limitation in OAC rule 3745-18-06 because the emissions unit burns only natural gas.

### II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel 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 and quantity of fuel burned in 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 deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

### V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate 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).

**1.b** Emission Limitation:

0.020 lb of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing a stack test in accordance with 40 CFR Part 60, Appendix A, Method 5. Dividing the USEPA's AP42 emission factor of 1.9 lbs of particulate emissions per MMscf of natural gas by the heat content of the natural gas, 1040 Btu/scf, results in an emission rate of 0.0018 lb PM/MMBtu.

**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:** Boiler #2 (B002)  
**Activity Description:** Steam generation

### 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>
boiler #2, Babcock and Wilcox model FM, 170 mmBtu/hr, fired with natural gas	OAC rule 3745-17-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb of particulate emissions per mmBtu of actual heat input
	OAC rule 3745-18-06(A)	See A.I.2.a below.

#### 2. Additional Terms and Conditions

- 2.a This emissions unit is not subject to any emission limitation in OAC rule 3745-18-06 because this emissions unit burns only natural gas.

### II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel 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 and quantity of fuel burned in 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 deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

### V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate 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).

**1.b** Emission Limitation:

0.020 lb of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

If required, compliance shall be demonstrated by performing a stack test in accordance with 40 CFR Part 60, Appendix A, Method 5. Dividing the USEPA's AP42 emission factor of 1.9 lbs of particulate emissions per MMscf of natural gas by the heat content of the natural gas, 1040 Btu/scf, results in an emission rate of 0.0018 lb PM/MMBtu.

**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:** Roadways and Parking Areas (F001)  
**Activity Description:** Vehicular Traffic on Plant Roadways and Parking Areas

#### 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>
roadways and parking areas: approximately 16 miles of paved and unpaved roadways and 19 acres of paved and unpaved parking areas used by vehicles with 4 to 18 wheels		
paved roadways and parking areas (see section A.1.2.a)	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 6 minutes during any 60-minute observation period.
	OAC rule 3745-17-08(B)(8)	reasonably available control measures (see sections A.1.2.c, A.1.2.d, A.1.2.e, and A.1.2.i)
unpaved roadways and parking areas (see section A.1.2.b)	OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period.
	OAC rule 3745-17-08(B)(2)	reasonably available control measures (see sections A.1.2.f through A.1.2.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:

- 1 - main entrance: road west to M&E office, main entrance, by 12" mill to hot metal bridge, truck hopper around stripper building to WQCC to Trump Rd. and around #5 steel conditioning
- 2 - west end of plant
- 3 - road between #4 steel conditioning and #2 steel conditioning
- 4 - road to 8" mill
- 6 - road between bottom pour and 35" mill
- 8 - road to #4 and #3 melt shop
- 9 - north side #3 melt shop, small stretch east
- 10 - east side of #4 melt shop
- 11 - southeast side of #4 melt shop
- 18 - inventory storage area southwest end of plant near 8th Street
- 19 - inventory storage area west end of plant
- 22 - cast-roll (TM) facility

paved parking areas:

- C - roll shop
- D - carpenter shop
- F - M & E office
- H - WQCC (Water Quality Control Center)
- J - main lot, west
- K - machine shop
- L - met/chem lab
- M - main lot, east
- N - main lot, north
- O - main lot, south
- R - 35" mill, central
- V - meter shop
- AA - melt shop
- AH - cast roll (TM) facility

The paved road segments and parking areas listed above are shown schematically in the plot plan, dated 06/05/96, which is included as part of the permittee's Title V application.

## 2. Additional Terms and Conditions (continued)

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

unpaved roadways:

- 5 - WQCC to #1 steel cond.
- 7 - road between #4 baghouse and #4 melt shop
- 12 - mobile repair to Heckett Road
- 13 - boiler house
- 14 - slag landfill roads
- 15 - power house road, west
- 16 - power house road, east
- 18 - inventory storage area, southwest end of plant near 8th Street
- 20 - inventory storage area, northeast end of plant
- 21 - inventory storage area, north central end of plant

unpaved parking areas:

- A - swing grind
- B - bar finish
- E - heat treat
- G - heat treat/bar finish
- I - 8" mill
- P - 12" mill
- Q - 35" mill, north
- S - 35" mill, south
- T - 35" mill, bury pits
- U - safety/transportation
- W - bottom pour
- X - boiler house
- Y - mobile repair
- Z - chem lab
- AB - teeming
- AC - caster
- AD - Airco
- AE - #5 steel conditioning
- AG - straddle buggy lot

The unpaved road segments and parking areas listed above are shown schematically in the plot plan, dated 06/05/96, which is included as part of the permittee's Title V application.

- 2.c** All paved roadways and parking areas shall be flushed with water to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.
- 2.d** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.e** The unpaved shoulders of all paved roadways shall be treated with water and/or any other suitable dust suppression chemicals to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.
- 2.f** All unpaved roadways and parking areas shall be treated with water and/or any other suitable dust suppression chemicals to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.

**2. Additional Terms and Conditions (continued)**

- 2.g** The control measures shall be implemented at frequencies that will minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and ensure compliance with the above-mentioned visible emission limitations, and the needed frequencies of implementation shall be determined by the permittee's inspections. It is further understood that on any specific day implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations.
- 2.h** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be considered as a paved roadway or parking area, and controlled with the control measure specified above for paved surfaces. Such unpaved roadway or parking area shall remain subject to the visible emission limitation for unpaved roadways and parking areas.
- 2.i** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary to minimize or eliminate visible emissions of fugitive dust.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

**1.a** paved roadways: minimum required frequency:

- 1 weekly
- 2 weekly
- 3 weekly
- 4 weekly
- 6 weekly
- 8 weekly
- 9 weekly
- 10 weekly
- 11 weekly
- 18 weekly
- 19 weekly
- 22 weekly

**1.b** paved parking areas: minimum required frequency:

- C weekly
- D weekly
- F weekly
- H weekly
- J weekly
- K weekly
- L weekly
- M weekly
- N weekly
- O weekly
- R weekly
- V weekly
- AA weekly
- AH weekly

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

<b>1.c</b>	unpaved roadways:	minimum required frequency:
	5	daily
	7	daily
	12	daily
	13	daily
	14	daily
	15	daily
	16	daily
	18	daily
	20	daily
	21	daily

<b>1.d</b>	unpaved parking areas:	minimum required frequency
	A	daily
	B	daily
	E	daily
	G	daily
	I	daily
	P	daily
	Q	daily
	S	daily
	T	daily
	U	daily
	W	daily
	X	daily
	Y	daily
	Z	daily
	AB	daily
	AC	daily
	AD	daily
	AE	daily
	AG	daily

**1.e** The purpose of the inspections is to determine the need for implementing the control measures specified in section A.1.2. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has(have) ended, except if the next required inspection is within one week.

**1.f** The permittee may, upon receipt of written approval from the Canton City Health Department, Air Pollution Control Division, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations.

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

2. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.
3. The information required in section A.III.2.d, above, shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

### IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

### V. Testing Requirements

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

**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 6 minutes during any 60-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 13 minutes during any 60-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.

Facility Name: **Republic Engineered Steels, Inc. - Canton Works**  
Facility ID: **15-76-05-0694**  
Emissions Unit: **Roadways and Parking Areas (F001)**

**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:** Conventional Teeming (F003)  
**Activity Description:** Conventional teeming in #3 and #4 melt shops

#### 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>
conventional teeming aisle #3 controlled by the #3 melt shop baghouse (BGH02)	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases, and see A.I.2.c and A.I.2.e below.
conventional teeming aisle #4 controlled by the #4 melt shop baghouse (BGH01)	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	See A.I.2.d below.
	OAC rule 3745-17-11	10 lbs/hr of particulate emissions
		See A.I.2.f below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

## 2. Additional Terms and Conditions (continued)

- 2.c** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM for the conventional teeming aisle #3 shall include the following:

- i. the capture of fugitive particulate emissions using canopy hoods; and
- ii. the control of fugitive particulate emissions using a baghouse (BGH02) with an outlet emission rate of not greater than 0.0052 gr/dscf.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d** The permittee's employment of RACM, at a minimum, for the conventional teeming aisle #4 shall consist of the capture of the fugitive particulate emissions using canopy hoods (i.e., building evacuation).
- 2.e** Emissions units F003, P064, P068, P902, P903, and Z027 shall be vented to the #3 melt shop baghouse. The total allowable outlet emission rate from this baghouse, in accordance with the RACM determination, shall not exceed 0.0052 gr/dscf.
- 2.f** The particulate emission rate for the #4 teeming aisle (BGH01) is regulated under OAC rule 3745-17-11, since this teeming aisle had stack emissions prior to 1972. The permittee shall comply with the more restrictive requirement of either Table 1 or Figure II. Based on calculations using AP-42 emission factor from section 12.5 of 0.07 lb/ton, Figure II does not apply because the uncontrolled mass rate of emissions (UMRE) was determined to be less than 10 lbs/hr. Since the limit from Table 1, based on process weight rate, is greater than 10 lbs/hr, the allowable limit of 10 lbs/hr of particulate matter was established to ensure that Figure II will not become applicable to this emissions unit.

## II. Operational Restrictions

1. The pressure drop across baghouses BGH01 and BGH02 shall be maintained within the manufacturer's recommended range of 4 to 8 inches of water for BGH01 and 2 to 9 inches of water for BGH02, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established during the next emission testing required in section A.V.2. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 1 month after completion of the emission testing.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across baghouses BGH01 and BGH02 while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on a daily basis.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

#### IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across either or both baghouses BGH01 and BGH02 did not comply with the allowable ranges specified above.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### V. Testing Requirements

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

**1.a** Emission Limitation:

20% opacity as a 6-minute average (stack emissions)

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average (fugitive emissions)

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible particulate fugitive emissions shall include any non-stack egress points from the building. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

0.0052 grain of particulate emissions per dry standard cubic foot of exhaust (teeming aisle #3 - BGH02)

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

## V. Testing Requirements (continued)

### 1.d Emission Limit:

10 lbs/hr particulate emissions (teeming aisle #4 - BGH01)

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03(B)(10).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable visible particulate emissions limitation and the allowable mass emission rates for particulates (for both BGH01 and BGH02).
  - c. The following parameter also shall be monitored and recorded during the emissions testing: the pressure drop across each baghouse.
  - d. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
    - i. for the visible particulate emissions limitation(s), Method 9 of 40 CFR Part 60, Appendix A; and
    - ii. for the allowable mass emission rates for particulates, Method 5 of 40 CFR Part 60, Appendix A.
  - e. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## 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:** Ingot Inoculation - Aisle #4 (P005)  
**Activity Description:** Ingot Lead Inoculation Aisle #4 - #4 Melt Shop

#### 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>
THIS EMISSIONS UNIT HAS BEEN PERMANENTLY SHUTDOWN AND WILL BE REMOVED FROM THE PERMIT RECOMMENDATION UPON RECEIPT OF THE REVISED APPLICATION.	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)(1)	See A.I.2.c below.
	OAC rule 3745-17-11 (Figure II)	3.45 lbs/hr of particulate emissions

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
  - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
  - ii. the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

At a minimum, the permittee's employment of RACM shall include the following: localized hooding over the emissions unit.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established during the next emission testing required in section A.V.2. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 1 month after completion of the emission testing.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit, and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

3.45 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

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

b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the visible particulate emissions limitations.

c. The following parameter shall also be monitored and recorded during the emissions testing: the pressure drop across the baghouse.

d. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):

i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A; and

ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A.

e. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

## **V. Testing Requirements (continued)**

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## **VI. Miscellaneous Requirements**

1. The baghouse serving this emissions unit also serves the other lead teeming line (emissions unit P118).

**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:** 12" Mill No. 1 Furnace (P006)  
**Activity Description:** Billet reheating 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>
12" mill no. 1 billet reheat furnace, fired with natural gas and rated at 131 mmBtu/hr	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- This emissions unit is not subject to the requirements of OAC rule 3745-17-11; therefore, the visible particulate emission limitation from OAC rule 3745-17-07(A)(1) also does not apply.
- No process weight rate can be determined and the uncontrolled mass rate of emissions (UMRE) for particulates is less than 10 pounds per hour; therefore, there is no applicable particulate emission limit from OAC rule 3745-17-11.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue, North, Canton, Ohio 44702.

Facility Name: **Republic Engineered Steels, Inc. - Canton Works**  
Facility ID: **15-76-05-0694**  
Emissions Unit: **12" Mill No. 1 Furnace (P006)**

**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:** 12" Mill No. 2 Furnace (P007)  
**Activity Description:** Billet reheating 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>
12" mill no. 2 billet reheat furnace, fired with natural gas and rated at 131 mmBtu/hr	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- This emissions unit is not subject to the requirements of OAC rule 3745-17-11; therefore, the visible particulate emission limitation from OAC rule 3745-17-07(A)(1) also does not apply.
- No process weight rate can be determined and the uncontrolled mass rate of emissions (UMRE) for particulates is less than 10 pounds per hour; therefore, there is no applicable particulate emission limit from OAC rule 3745-17-11.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

Facility Name: **Republic Engineered Steels, Inc. - Canton Works**  
Facility ID: **15-76-05-0694**  
Emissions Unit: **12" Mill No. 2 Furnace (P007)**

**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:** Soaking Pit Block #1 (P008)  
**Activity Description:** Steel Ingot Heating Soaking Pit

#### 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>
soaking pit block #1 with 4 pits, fired with natural gas with each pit rated at 8 mmBtu/hr	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- This emissions unit is not subject to the requirements of OAC rule 3745-17-11; therefore, the visible particulate emission limitation from OAC rule 3745-17-07(A)(1) also does not apply.
- No process weight rate can be determined and the uncontrolled mass rate of emissions (UMRE) for particulates is less than 10 pounds per hour; therefore, there is no applicable particulate emission limit from OAC rule 3745-17-11.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

Facility Name: **Republic Engineered Steels, Inc. - Canton Works**  
Facility ID: **15-76-05-0694**  
Emissions Unit: **Soaking Pit Block #1 (P008)**

**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:** Soaking Pit Block #2 (P009)  
**Activity Description:** Steel Ingot Heating Soaking Pit

#### 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>
soaking pit block #2 with 4 pits, fired with natural gas with each pit rated at 14.4 mmBtu/hr	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- This emissions unit is not subject to the requirements of OAC rule 3745-17-11; therefore, the visible particulate emission limitation from OAC rule 3745-17-07(A)(1) also does not apply.
- No process weight rate can be determined and the uncontrolled mass rate of emissions (UMRE) for particulates is less than 10 pounds per hour; therefore, there is no applicable particulate emission limit from OAC rule 3745-17-11.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

Facility Name: **Republic Engineered Steels, Inc. - Canton Works**  
Facility ID: **15-76-05-0694**  
Emissions Unit: **Soaking Pit Block #2 (P009)**

**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:** Soaking Pit Block #3 (P010)  
**Activity Description:** Steel Ingot Heating Soaking Pit

### 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>
soaking pit block #3 with 4 pits, fired with natural gas with each pit rated at 14.4 mmBtu/hr	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

#### 2. Additional Terms and Conditions

- 2.a This emissions unit is not subject to the requirements of OAC rule 3745-17-11; therefore, the visible particulate emission limitation from OAC rule 3745-17-07(A)(1) also does not apply.
- 2.b No process weight rate can be determined and the uncontrolled mass rate of emissions (UMRE) for particulates is less than 10 pounds per hour; therefore, there is no applicable particulate emission limit from OAC rule 3745-17-11.
- 2.c The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

### II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel 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 and quantity of fuel burned in 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 deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

Facility Name: **Republic Engineered Steels, Inc. - Canton Works**  
Facility ID: **15-76-05-0694**  
Emissions Unit: **Soaking Pit Block #3 (P010)**

**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:** Soaking Pit Block #4 (P011)  
**Activity Description:** Steel Ingot Heating Soaking Pit

#### 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>
soaking pit block #4 with 4 pits, fired with natural gas with each pit rated at 10 mmBtu/hr	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- This emissions unit is not subject to the requirements of OAC rule 3745-17-11; therefore, the visible particulate emission limitation from OAC rule 3745-17-07(A)(1) also does not apply.
- No process weight rate can be determined and the uncontrolled mass rate of emissions (UMRE) for particulates is less than 10 pounds per hour; therefore, there is no applicable particulate emission limit from OAC rule 3745-17-11.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

Facility Name: **Republic Engineered Steels, Inc. - Canton Works**  
Facility ID: **15-76-05-0694**  
Emissions Unit: **Soaking Pit Block #4 (P011)**

**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:** Soaking Pit Block #6 (P013)  
**Activity Description:** Steel Ingot Heating Soaking Pit

#### 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>
soaking pit block #6 with 4 pits, fired with natural gas with each pit rated at 8 mmBtu/hr	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- This emissions unit is not subject to the requirements of OAC rule 3745-17-11; therefore, the visible particulate emission limitation from OAC rule 3745-17-07(A)(1) also does not apply.
- No process weight rate can be determined and the uncontrolled mass rate of emissions (UMRE) for particulates is less than 10 pounds per hour; therefore, there is no applicable particulate emission limit from OAC rule 3745-17-11.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

Facility Name: **Republic Engineered Steels, Inc. - Canton Works**  
Facility ID: **15-76-05-0694**  
Emissions Unit: **Soaking Pit Block #6 (P013)**

**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:** Soaking Pit Block #7 (P014)  
**Activity Description:** Steel Ingot Heating Soaking Pit

#### 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>
soaking pit block #7 with 4 pits, fired with natural gas with each pit rated at 17.5 mmBtu/hr	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- This emissions unit is not subject to the requirements of OAC rule 3745-17-11; therefore, the visible particulate emission limitation from OAC rule 3745-17-07(A)(1) also does not apply.
- No process weight rate can be determined and the uncontrolled mass rate of emissions (UMRE) for particulates is less than 10 pounds per hour; therefore, there is no applicable particulate emission limit from OAC rule 3745-17-11.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

Facility Name: **Republic Engineered Steels, Inc. - Canton Works**  
Facility ID: **15-76-05-0694**  
Emissions Unit: **Soaking Pit Block #7 (P014)**

**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:** Soaking Pit Block #8 (P015)  
**Activity Description:** Steel Ingot Heating Soaking Pit

#### 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>
soaking pit block #8 with 5 pits, fired with natural gas with each pit rated at 12 mmBtu/hr	OAC rule 3745-17-07(A)(1)	See A.1.2.a below.
	OAC rule 3745-17-11	See A.1.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.1.2.c below.

##### 2. Additional Terms and Conditions

- This emissions unit is not subject to the requirements of OAC rule 3745-17-11; therefore, the visible particulate emission limitation from OAC rule 3745-17-07(A)(1) also does not apply.
- No process weight rate can be determined and the uncontrolled mass rate of emissions (UMRE) for particulates is less than 10 pounds per hour; therefore, there is no applicable particulate emission limit from OAC rule 3745-17-11.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

Facility Name: **Republic Engineered Steels, Inc. - Canton Works**  
Facility ID: **15-76-05-0694**  
Emissions Unit: **Soaking Pit Block #8 (P015)**

**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:** Soaking Pit Block #9 (P016)  
**Activity Description:** Steel Ingot Heating Soaking Pit

#### 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>
Soaking Pit Block #9 with 5 pits, natural gas fired with each pit rated at 9.5 MMBtu/hr	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- This emissions unit is not subject to the requirements of OAC rule 3745-17-11; therefore, the visible particulate emission limitation from OAC rule 3745-17-07(A)(1) also does not apply.
- No process weight rate can be determined and the uncontrolled mass rate of emissions (UMRE) for particulates is less than 10 pounds per hour; therefore, there is no applicable particulate emission limit from OAC rule 3745-17-11.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

Facility Name: **Republic Engineered Steels, Inc. - Canton Works**  
Facility ID: **15-76-05-0694**  
Emissions Unit: **Soaking Pit Block #9 (P016)**

**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:** No. 2 Roller Hearth Quench Furnace (P037)  
**Activity Description:** Steel heat treating 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>
no. 2 roller hearth quench furnace, 13.56 mmBtu/hr, fired with natural gas	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.b The permittee shall minimize or eliminate visible particulate emissions through the employment of reasonably available control measures (RACM).  
  
At a minimum, the permittee's employment of RACM shall consist of the use of only natural gas as fuel for the furnace.
- 2.c The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

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

#### 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.

#### IV. Reporting Requirements (continued)

2. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### V. Testing Requirements

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

- 1.a Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

#### 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:** #4 Steel Conditioning Torch Cutting (P061)  
**Activity Description:** Torch cutting machine for specialty ingots

#### 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>
#4 steel conditioning torch cutting (L-Tec torch cutting machine) controlled by the #4 steel conditioning torch cutting settling chamber (SCH01) and the #4 steel conditioning torch cutting baghouse (BGH04)	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- The permittee shall minimize or eliminate visible particulate emissions of fugitive dust through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include: localized hooding at each torch cutting machine to capture swarf and process emissions, and venting these emissions to the settling chamber (SCH01) as the primary collector and then to the baghouse (BGH04).

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design, and the control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s), whichever is less stringent.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 3 to 12 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within six months after permit issuance.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCDH, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit, and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

0.030 grain of particulate emissions per dry standard cubic foot of exhaust or no visible particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10) or the requirements established in 40 CFR Part 60, Appendix A, Method 22, as appropriate.

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the visible particulate emissions limitations.

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

i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A; and

ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A.

d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

e. The following parameter shall also be monitored and recorded during the emissions testing: the pressure drop across the baghouse.

## **V. Testing Requirements (continued)**

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## **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:** AOD Vessel #3 Melt Shop (P064)  
**Activity Description:** 100 Ton Salem Corp. Argon/Oxygen Decarburization Vessel

#### 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>
argon/oxygen decarburization (AOD) vessel in #3 melt shop, with a 153.2 tons/hr process weight rate, controlled by the #3 melt shop baghouse (BGH02)	OAC rule 3745-31-05 (PTI 15-009)	BAT was determined to be compliance with all applicable rules.
	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases
		See Sections A.I.2.c and A.I.2.e below.
	OAC rule 3745-17-11	See A.I.2.d below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following:

- i. localized hooding over the AOD vessel; and
- ii. control of particulate emissions using a baghouse with an outlet emission rate that shall not exceed 0.0052 gr/dscf.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

## 2. Additional Terms and Conditions (continued)

- 2.d The particulate emissions limitation required by OAC rule 3745-17-11 is less stringent than the particulate emission limitation established pursuant to the RACM requirements specified in OAC rule 3745-17-08.
- 2.e Emissions units F003, P064, P068, P902, P903, and Z027 shall be vented to the #3 melt shop baghouse. The total allowable outlet emission rate from this baghouse shall not exceed 0.0052 gr/dscf.

## II. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 2 to 9 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established during the next emission testing required in section A.V.2. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 1 month after completion of the emissions test.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
- 2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

- 1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above, as well as the corrective actions that were taken to achieve compliance.
- 2. The permittee shall submit semiannual written reports which:
  - 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 eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

- 3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- 4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
20% opacity as a 6-minute average  
  
Applicable Compliance Method:  
  
Compliance shall be determined 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).
  - 1.b Emission Limitation:  
  
20% opacity as a 3-minute average  
  
Applicable Compliance Method:  
  
Compliance shall be determined 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). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.
  - 1.c Emission Limitation:  
  
0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases  
  
Applicable Compliance Method:  
  
Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate matter and the visible particulate emissions limitation.
  - c. The following parameter also shall be monitored and recorded during the emissions testing: the pressure drop across the baghouse.
  - d. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
    - i. for the visible particulate emissions limitation, Method 9 of 40 CFR Part 60, Appendix A; and
    - ii. for the mass emission rate for particulate matter, Method 5 of 40 CFR Part 60, Appendix A.
  - e. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

## V. Testing Requirements (continued)

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## 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:** #3 & #4 Melt Shops Lime and Alloy Transfer (P068)  
**Activity Description:** Lime and alloy transfer and conveying system

#### 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>
#3 and #4 melt shops lime and alloy transfer, belt transfer and conveying system with a maximum process weight rate of 125 tons/hour as follows:		
belt conveyor from truck hopper to chute with hood at drop point, chute to belt conveyor, belt conveyor to two way chute with hood at drop point, two way chute to belt conveyor with hood at drop point, belt conveyor to #4 melt shop trip car - all hoods are vented to the crossover conveyor baghouse (BGH21)	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B) OAC rule 3745-17-11 (Figure II)	See A.I.2.a below. See A.I.2.b below. See A.I.2.c below. 10 lbs/hr of particulate emissions See A.I.2.e below.
two way chute to shuttle conveyor with hood at drop point, shuttle conveyor to #3 melt shop chrome & lime bins with hood at drop point, chrome and lime bins to belt conveyor with hoods at drop points, belt conveyor to #3 melt shop initial charge car with hoods at drop point - all hoods vented to the #3 melt shop lime/alloy baghouse (BGH23)	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)(3)	See A.I.2.a below. See A.I.2.b below. 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack, whichever is less stringent  See A.I.2.c below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#3 melt shop initial charge car to the #3 melt shop controlled by the #3 melt shop baghouse (BGH02) via canopy hoods	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B)	See A.I.2.a below. See A.I.2.b below. 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust See A.I.2.c below.
belt conveyor to #4 melt shop trip car, #4 melt shop trip car to the #4 melt shop lim/alloy bins, lime/alloy bins to the alloy weigh car with chute, alloy weigh car to the #4 initial charge car controlled by the #4 melt shop baghouse (BGH01) via building evacuation	OAC rule 3745-17-07(A)(1) OAC rule 3745-17-07(B)(1) OAC rule 3745-17-08(B) OAC rule 3745-17-11 (Figure II)	See A.I.2.a below. See A.I.2.b below. See A.I.2.c below. 10 lbs/hr of particulate emissions See A.I.2.e below.

**2. Additional Terms and Conditions**

- 2.a** Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b** Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

## 2. Additional Terms and Conditions (continued)

- 2.c** The permittee shall minimize or eliminate visible particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall consist of the following:

- i. localized hooding above the chute at the end of the belt conveyor coming from the truck hopper;
- ii. localized hooding above the two-way chute at the end of the belt conveyor coming from the chute denoted above;
- iii. localized hooding at the bottom of the two-way chute over the belt conveyor leading to the #4 melt shop trip car;
- iv. building evacuation for the #4 melt shop trip car;
- v. building evacuation vented to the #3 melt shop baghouse (BGH02) and the #4 melt shop baghouse (BGH01) for the initial charge car going to the #3 and #4 melt shops;
- vi. localized hooding at the bottom of the two-way chute over the shuttle conveyor leading to the #3 melt shop chrome and lime bins, and vented to the #3 melt shop lime/alloy baghouse (BGH23);
- vii. localized hooding at the bottom of the #3 melt shop chrome and lime bins over the belt conveyor leading to the #3 melt shop initial charge car, and vented to BGH23; and
- viii. localized hooding over the #3 melt shop initial charge car, and vented to BGH23.

For the fugitive emissions captured and vented to the #3 melt shop baghouse (BGH02) the baghouse shall achieve an outlet emission rate of 0.0052 gr/dscf, and for fugitive emissions captured and vented to #3 melt shop lime/alloy baghouse (BGH23) the baghouse shall achieve an outlet emission rate of 0.030 gr/dscf (or no visible emissions from the exhaust stack, whichever is less stringent).

In each case mentioned above where localized hooding is used, the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d** The particulate emission rate for the #4 melt shop baghouse (BGH01) and the crossover conveyor baghouse (BGH21) is regulated under OAC rule 3745-17-11, since these baghouses were installed prior to 1972. The permittee shall comply with the more restrictive requirement of either Table 1 or Figure II. Based on calculations using an AP-42 emission factor from section 13.2.4, Figure II does not apply because the uncontrolled mass rate of emissions (UMRE) was determined to be less than 10 lbs/hr. Since the limit from Table 1, based on process weight rate, is greater than 10 lbs/hr, the allowable limit of 10 lbs/hr of particulate matter was established to ensure that Figure II will not become applicable to this emissions unit.
- 2.e** Emissions units F003, P064, P068, P902, P903, and Z027 shall be vented to the #3 melt shop baghouse (BGH02). The total allowable outlet emission rate from this baghouse shall not exceed 0.0052 gr/dscf.

## II. Operational Restrictions

1. The pressure drop across the baghouses shall be maintained within the manufacturer's recommended ranges of 4 to 8 inches of water for BGH01 and 2 to 9 inches of water for BGH02, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 6 months after issuance of this permit.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across baghouses BGH01 and BGH02 while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.

Baghouses BGH21 and BGH23 are located in the rafters of the buildings and are not readily accessible; therefore, the pressure drop monitoring will not be required for these baghouses.

2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit and for any visible particulate emissions from the stacks serving baghouses BGH21 and BGH23. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

### IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit and/or from the stacks serving baghouses BGH21 or BGH23; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit pressure drop deviation (excursion) reports for baghouses BGH01 and BGH02 that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above, as well as the corrective actions that were taken to achieve compliance.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

### V. Testing Requirements

1. Compliance with the emissions limitations in section A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

**1.a** Emission Limitation:

20% opacity as a 6-minute average (stack emissions)

Applicable Compliance Method:

Compliance shall be determined 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). This limitation applies to the stack emissions from all four baghouses (BGH01, BGH02, BGH21, and BGH23).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

20% opacity as a 3-minute average (fugitive emissions)

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases

Applicable Compliance Method:

This limitation applies to stack emissions from the #3 melt shop baghouse (BGH02). If required by the Canton City Health Department, Air Pollution Control Division, compliance shall be demonstrated using Test Methods 1 through 5 in 40 CFR, Part 60, Appendix A; otherwise, compliance shall be demonstrated by the absence of any visible emissions from the baghouses serving this emissions unit and using Test Method 22 in 40 CFR, Part 60, Appendix A.

**1.d** Emission Limitation:

0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or the limit from A.V.1.e below, whichever is less stringent

Applicable Compliance Method:

This limitation applies to the #3 melt shop lime/alloy baghouse (BGH23). If required by the Canton City Health Department, Air Pollution Control Division, compliance shall be demonstrated using Test Methods 1 through 5 in 40 CFR, Part 60, Appendix A; otherwise, compliance shall be demonstrated by the absence of any visible emissions from the baghouses serving this emissions unit and using Test Method 22 in 40 CFR, Part 60, Appendix A.

**1.e** Emission Limitation:

10 lbs/hr of particulate emissions

Applicable Compliance Method:

This condition applies to the stack emissions from the #4 melt shop baghouse (BGH01) and the crossover conveyor baghouse (BGH21). If required by the Canton City Health Department, Air Pollution Control Division, compliance shall be demonstrated using Test Methods 1 through 5 in 40 CFR, Part 60, Appendix A; otherwise, compliance shall be demonstrated by the absence of any visible emissions from the baghouses serving this emissions unit and using Test Method 22 in 40 CFR, Part 60, Appendix A.

## **V. Testing Requirements (continued)**

2. If required, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates from the outlets of baghouses BGH01, BGH02, BGH21, and BGH23, and the visible particulate emissions limitations.
  - b. The following parameters shall also be monitored and recorded during the emissions testing: the pressure drop across the baghouse.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
    - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A; and
    - ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A.
  - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## **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:** #4 Grinder at #5 Steel Conditioning (P070)  
**Activity Description:** Steel billet grinder

#### 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>
#4 grinder at #5 steel conditioning controlled by a settling chamber (SCHO3) and a baghouse (BGH10) and vented inside the building	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	See A.I.2.c below.
	OAC rule 3745-17-11(A)	31.8 lbs/hr of particulate emissions
		See A.I.2.d below.
	OAC rule 3745-31-05(A)(3)	See A.I.2.e below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: localized hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d Emissions units P070, P071, P074, P076, and P078 are similar emissions units; therefore, the total uncontrolled mass rate of emissions from all units shall be used to determine the allowable emission limit from OAC rule 3745-17-11, Figure II. From a 12/17/87 stack test for one unit, the UMRE was determined to be 99.26 lbs/hr of particulate emissions. The total UMRE is therefore 496.3 lbs/hr of particulate emissions. Using Curve P-1 from Figure II, the total allowable emission rate was determined to be 31.8 lbs/hr for all five grinding operations combined.

## 2. Additional Terms and Conditions (continued)

- 2.e In accordance with PTI 15-054, BAT was determined to be compliance with all applicable rules.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 3 to 8 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within six months after permit issuance.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

31.8 lbs/hr of particulate emissions - combined total for emissions units P070, P071, P074, P076, and P078

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

- a. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the visible particulate emissions limitations.
- b. The following parameters shall also be monitored and recorded during the emissions testing: the pressure drop across the baghouse.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
  - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A; and
  - ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

## **V. Testing Requirements (continued)**

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## **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:** #5 Grinder at #5 Steel Conditioning (P071)  
**Activity Description:** Steel billet grinder

#### 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>
#5 grinder at #5 steel conditioning controlled by a settling chamber (SCHO4) and a baghouse (BGH11) and vented inside the building	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	See A.I.2.c below.
	OAC rule 3745-17-11(A)	31.8 lbs/hr of particulate emissions
		See A.I.2.d below.
	OAC rule 3745-31-05(A)(3)	See A.I.2.e below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: localized hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d Emissions units P070, P071, P074, P076, and P078 are similar emissions units; therefore, the total uncontrolled mass rate of emissions from all units shall be used to determine the allowable emission limit from OAC rule 3745-17-11, Figure II. From a 12/17/87 stack test for one unit, the UMRE was determined to be 99.26 lbs/hr of particulate emissions. The total UMRE is therefore 496.3 lbs/hr of particulate emissions. Using Curve P-1 from Figure II, the total allowable emission rate was determined to be 31.8 lbs/hr for all five grinding operations combined.

## 2. Additional Terms and Conditions (continued)

- 2.e In accordance with PTI 15-055, BAT was determined to be compliance with all applicable rules.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 3 to 8 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 6 months of permit issuance.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

31.8 lbs/hr of particulate emissions - combined total for emissions units P070, P071, P074, P076, and P078

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

- a. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the visible particulate emissions limitations.
- b. The following parameters shall also be monitored and recorded during the emissions testing: the pressure drop across the baghouse.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
  - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A; and
  - ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

## **V. Testing Requirements (continued)**

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## **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:** #10 Grinder at #5 Steel Conditioning (P074)  
**Activity Description:** Steel billet grinder

#### 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>
#10 grinder at #5 steel conditioning controlled by a settling chamber (SCHO7) and a baghouse (BGH14) and vented outside the building due to the processing of leaded steel	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	See A.I.2.c below.
	OAC rule 3745-17-11(A)	31.8 lbs/hr of particulate emissions
	OAC rule 3745-31-05(A)(3)	See A.I.2.d below. See A.I.2.e below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: localized hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d Emissions units P070, P071, P074, P076, and P078 are similar emissions units; therefore, the total uncontrolled mass rate of emissions from all units shall be used to determine the allowable emission limit from OAC rule 3745-17-11, Figure II. From a 12/17/87 stack test for one unit, the UMRE was determined to be 99.26 lbs/hr of particulate emissions. The total UMRE is therefore 496.3 lbs/hr of particulate emissions. Using Curve P-1 from Figure II, the total allowable emission rate was determined to be 31.8 lbs/hr for all five grinding operations combined.

## 2. Additional Terms and Conditions (continued)

- 2.e In accordance with PTI 15-055, BAT was determined to be compliance with all applicable rules.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 3 to 8 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 6 months of permit issuance.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

31.8 lbs/hr of particulate emissions - combined total for emissions units P070, P071, P074, P076, and P078

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

- a. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the visible particulate emissions limitations.
- b. The following parameters shall also be monitored and recorded during the emissions testing: the pressure drop across the baghouse.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
  - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A; and
  - ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

## **V. Testing Requirements (continued)**

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## **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:** #12 Grinder at #5 Steel Conditioning (P076)  
**Activity Description:** Steel billet grinder

#### 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>
#12 grinder at #5 steel conditioning controlled by a settling chamber (SCHO9) and a baghouse (BGH16) and vented outside the building	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	See A.I.2.c below.
	OAC rule 3745-17-11(A)	31.8 lbs/hr of particulate emissions
		See A.I.2.d below.
	OAC rule 3745-31-05(A)(3)	See A.I.2.e below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: localized hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d Emissions units P070, P071, P074, P076, and P078 are similar emissions units; therefore, the total uncontrolled mass rate of emissions from all units shall be used to determine the allowable emission limit from OAC rule 3745-17-11, Figure II. From a 12/17/87 stack test for one unit, the UMRE was determined to be 99.26 lbs/hr of particulate emissions. The total UMRE is therefore 496.3 lbs/hr of particulate emissions. Using Curve P-1 from Figure II, the total allowable emission rate was determined to be 31.8 lbs/hr for all five grinding operations combined.

## 2. Additional Terms and Conditions (continued)

- 2.e In accordance with PTI 15-055, BAT was determined to be compliance with all applicable rules.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 3 to 8 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 6 months of permit issuance.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

31.8 lbs/hr of particulate emissions - combined total for emissions units P070, P071, P074, P076, and P078

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

- a. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the visible particulate emissions limitations.
- b. The following parameters shall also be monitored and recorded during the emissions testing: the pressure drop across the baghouse.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
  - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A; and
  - ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

## **V. Testing Requirements (continued)**

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## **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:** #14 Grinder at #5 Steel Conditioning (P078)  
**Activity Description:** Steel billet grinder

#### 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>
#14 grinder at #5 steel conditioning controlled by a settling chamber (SCH11) and a baghouse (BGH18) and vented inside the building	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	See A.I.2.c below.
	OAC rule 3745-17-11(A)	31.8 lbs/hr of particulate emissions
		See A.I.2.d below.
	OAC rule 3745-31-05(A)(3)	See A.I.2.e below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: localized hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d Emissions units P070, P071, P074, P076, and P078 are similar emissions units; therefore, the total uncontrolled mass rate of emissions from all units shall be used to determine the allowable emission limit from OAC rule 3745-17-11, Figure II. From a 12/17/87 stack test for one unit, the UMRE was determined to be 99.26 lbs/hr of particulate emissions. The total UMRE is therefore 496.3 lbs/hr of particulate emissions. Using Curve P-1 from Figure II, the total allowable emission rate was determined to be 31.8 lbs/hr for all five grinding operations combined.

## 2. Additional Terms and Conditions (continued)

- 2.e In accordance with PTI 15-055, BAT was determined to be compliance with all applicable rules.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 3 to 8 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 6 months of permit issuance.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions. These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

31.8 lbs/hr of particulate emissions - combined total for emissions units P070, P071, P074, P076, and P078

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

- a. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the visible particulate emissions limitations.
- b. The following parameters shall also be monitored and recorded during the emissions testing: the pressure drop across the baghouse.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
  - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A; and
  - ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

## **V. Testing Requirements (continued)**

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## **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:** #1 Round Grinder at #4 Steel Conditioning (P081)  
**Activity Description:** Steel Grinder

#### 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>
#1 round grinder at #4 steel conditioning with a maximum process weight rate of 35 tons/hour, controlled by the #4 steel conditioning/#1 round grinder settling chamber (SCH12) and the #4 steel conditioning/#1 round grinder baghouse (BGH05)	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	See A.I.2.c below.
	OAC rule 3745-17-11(A) (Figure II)	11.2 lbs/hr of particulate emissions
	OAC rule 3745-31-05(A)(3) (PTI 15-073)	See A.I.2.d below.

##### 2. Additional Terms and Conditions

- 2.a** Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b** Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: localized hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d** In accordance with PTI 15-073, BAT was determined to be compliance with all applicable rules.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 1 to 11 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 6 months of permit issuance.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above, as well as the corrective actions that were taken to achieve compliance.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

11.2 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

- a. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the visible particulate emissions limitations.
- b. The following parameters shall also be monitored and recorded during the emissions testing: the pressure drop across the baghouse.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
  - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A; and
  - ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

## **V. Testing Requirements (continued)**

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## **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:** #2 Slab Grinder at #4 Steel Conditioning (P082)  
**Activity Description:** Steel Slab Grinder

#### 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>
#2 slab grinder at #4 steel conditioning with a maximum process weight rate of 16 tons/hour, controlled by the #4 steel conditioning/#2 slab grinder settling chamber (SCH13) and the #4 steel conditioning/#2 slab grinder baghouse (BGH06)	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	See A.I.2.c below.
	OAC rule 3745-17-11(A) (Figure II)	11.2 lbs/hr of particulate emissions
	OAC rule 3745-31-05(A)(3) (PTI 15-073)	See A.I.2.d below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: localized hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d In accordance with PTI 15-073, BAT was determined to be compliance with all applicable rules.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 1 to 11 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 6 months of permit issuance.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above, as well as the corrective actions that were taken to achieve compliance.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

1. Compliance with the emissions limitations in section A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

## V. Testing Requirements (continued)

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

11.2 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

- a. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the visible particulate emissions limitations.
- b. The following parameters shall also be monitored and recorded during the emissions testing: the pressure drop across the baghouse.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
  - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A; and
  - ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

## V. Testing Requirements (continued)

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## 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:** #3 Slab Grinder at #4 Steel Conditioning (P083)  
**Activity Description:** Steel Slab Grinder

#### 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>
#3 slab grinder at #4 steel conditioning with a maximum process weight rate of 16 tons/hour, controlled by the #4 steel conditioning/#3 slab grinder settling chamber (SCH14) and the #4 steel conditioning/#3 slab grinder baghouse (BGH07)	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	See A.I.2.c below.
	OAC rule 3745-17-11(A) (Figure II)	11.2 lbs/hr of particulate emissions
	OAC rule 3745-31-05(A)(3) (PTI 15-073)	See A.I.2.d below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: localized hooding over the emissions unit.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d In accordance with PTI 15-073, BAT was determined to be compliance with all applicable rules.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 1 to 11 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 6 months of permit issuance.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above, as well as the corrective actions that were taken to achieve compliance.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

1. Compliance with the emissions limitations in section A.1.2 of these terms and conditions shall be determined in accordance with the following methods:

## V. Testing Requirements (continued)

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

11.2 lbs/hr of particulate emissions

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

- a. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the visible particulate emissions limitations.
- b. The following parameters shall also be monitored and recorded during the emissions testing: the pressure drop across the baghouse.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
  - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A; and
  - ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

## **V. Testing Requirements (continued)**

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## **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:** Car Type Box Anneal/Temp #3 (P094)  
**Activity Description:** Steel annealing/tempering 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>
car type box annealing/tempering furnace #3, 15 mmBtu/hr, fired with natural gas	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).  
  
At a minimum, the permittee's employment of RACM shall consist of the use of only natural gas as fuel for the furnace.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

#### II. Operational Restrictions

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

#### III. Monitoring and/or Record Keeping Requirements

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

#### IV. Reporting Requirements

- 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.

#### IV. Reporting Requirements (continued)

2. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### V. Testing Requirements

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

- 1.a Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

#### 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:** Car Type Box Anneal/Temp #4 (P095)  
**Activity Description:** Steel annealing/tempering 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>
car type box annealing/tempering furnace #4, 15 mmBtu/hr, fired with natural gas	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.b The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).  
  
At a minimum, the permittee's employment of RACM shall consist of the use of only natural gas as fuel for the furnace.
- 2.c The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

#### II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel 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 and quantity of fuel burned in 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.

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

#### **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:** Car Type Box Anneal/Temp #5 (P096)  
**Activity Description:** Steel annealing/tempering 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>
car type box annealing/tempering furnace #5, 15 mmBtu/hr, fired with natural gas	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).  
  
At a minimum, the permittee's employment of RACM shall consist of the use of only natural gas as fuel for the furnace.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.

**IV. Reporting Requirements (continued)**

2. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

**V. Testing Requirements**

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

**1.a** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

**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:** Car Type Box Anneal/Temp #8 (P099)  
**Activity Description:** Steel annealing/tempering 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>
car type box annealing/tempering furnace #8, 15 mmBtu/hr, fired with natural gas	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).  
  
At a minimum, the permittee's employment of RACM shall consist of the use of only natural gas as fuel for the furnace.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.

#### IV. Reporting Requirements (continued)

2. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### V. Testing Requirements

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

- 1.a Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

#### 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:** Car Type Box Anneal/Temp #10 (P101)  
**Activity Description:** Steel annealing/tempering 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>
car type box annealing/tempering furnace #10, 15 mmBtu/hr, fired with natural gas	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).  
  
At a minimum, the permittee's employment of RACM shall consist of the use of only natural gas as fuel for the furnace.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

##### IV. Reporting Requirements

- 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.

#### IV. Reporting Requirements (continued)

2. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### V. Testing Requirements

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

- 1.a Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

#### 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:** Car Type Box Anneal/Temp #16 (P104)  
**Activity Description:** Steel annealing/tempering 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>
car type box annealing/tempering furnace #16, 33 mmBtu/hr, fired with natural gas	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).  
  
At a minimum, the permittee's employment of RACM shall consist of the use of only natural gas as fuel for the furnace.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

#### II. Operational Restrictions

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

#### III. Monitoring and/or Record Keeping Requirements

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

#### IV. Reporting Requirements

- 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.

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

#### **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:** LRS #4 Melt Shop (P106)  
**Activity Description:** Ladle Metallurgy/Refining Station in #4 Melt Shop

#### 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>
ladle metallurgy/refining station in #4 melt shop controlled by a baghouse (BGH01)	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.c below.
	OAC rule 3745-18-06(E)(1)	1,099 lbs/hr of sulfur dioxide (SO <sub>2</sub> )
	OAC rule 3745-31-05(A)(3) (PTI 15-234)	0.005 grain of particulate emissions per dry standard cubic foot of exhaust gases
		See A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b The particulate emissions from this emissions unit shall be controlled by direct evacuation and canopy hoods vented to the baghouse serving the #4 melt shop. This limitation is in accordance with the federally enforceable permit to install 15-234 which was issued final on July 31, 1984.
- 2.c The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

##### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 4 to 8 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 6 months after permit issuance.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.

### IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above, as well as the corrective actions that were taken to achieve compliance.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

### V. Testing Requirements

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

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

1,099 lbs/hr of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be determined using Method 6 of 40 CFR Part 60, Appendix A. Based on the FIRE (version 6.22, dated 10/99) emission factor of 0.01 lb SO<sub>2</sub>/ton for electric arc furnaces, actual SO<sub>2</sub> emissions are expected to be much less than the allowable SO<sub>2</sub> emission rate.

**1.c** Emission Limitation:

0.005 grain of particulate emissions per dry standard cubic foot of exhaust gases

Applicable Compliance Method:

Compliance shall be determined using Method 5 of 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for sulfur dioxide and particulate matter, and the visible emissions limitation.
  - c. The following parameters shall also be monitored and recorded during the emissions testing: the process weight rate (in tons); and the pressure drop across the baghouse.
  - d. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
    - i. for the visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A;
    - ii. for the hourly emission rate for SO<sub>2</sub>, Method 6 of 40 CFR Part 60, Appendix A; and
    - iii. for the grain loading mass emission rate for particulate emissions, Method 5 of 40 CFR Part 60, Appendix A.
  - e. 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 CCHD, APCD.

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

Personnel from the appropriate CCHD, APCD 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 CCHD, APCD within 30 days following completion of the test(s).

## 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:** Ingot Inoculation - Aisle #1 (P118)  
**Activity Description:** Ingot inoculation at No. 1 platform

#### 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>
THIS EMISSIONS UNIT HAS BEEN PERMANENTLY SHUTDOWN AND WILL BE REMOVED FROM THE PERMIT RECOMMENDATION UPON RECEIPT OF THE REVISED APPLICATION.	OAC rule 3745-31-05(A)(3) (PTI 15-599)	0.23 lb/hr of particulate emissions 1.02 tpy of particulate emissions
		0.11 lb/hr of lead 0.49 tpy of lead
		See A.I.2.a below.
	OAC rule 3745-17-07(A)(1)	See A.I.2.b below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.c below.
	OAC rule 3745-17-08(B)	See A.I.2.d below.
	OAC rule 3745-17-11	See A.I.2.e below.

##### 2. Additional Terms and Conditions

- 2.a There shall be no visible fugitive particulate emissions attributable to lead teeming exiting any non-stack egress points from the building alongside the lead teeming aisles. These egress points shall include, but not be limited to, windows, doorways, and roof monitors.
- 2.b Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.c The visible particulate emission limitation for fugitive dust required by OAC rule 3745-17-07(B)(1) is less stringent than the visible particulate emissions limitation for fugitive dust established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- 2.d The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). The particulate emissions from this emissions unit during all of its operational phases shall be captured by hooding and vented to the baghouse. Any emissions not captured by the hooding associated with this emissions unit shall be contained and captured in the existing building's evacuation system which is vented to a baghouse. The system on the lead teeming shall be designed to minimize the fugitive emissions into the building.
- 2.e The particulate emissions limitation required by OAC rule 3745-17-11 is less stringent than the particulate emissions limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established during the next emission testing required in section A.V.2. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 1 month after completion of the emissions testing.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

0.23 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be determined using Method 5 of 40 CFR Part 60, Appendix A.

**1.c** Emission Limitation:

0.11 lb/hr of lead

Applicable Compliance Method:

Compliance shall be determined using Method 12 of 40 CFR Part 60, Appendix A.

**1.d** Emission Limitation:

1.02 tpy of particulate emissions

0.49 tpy of lead

Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

**1.e** Emission Limitation:

no visible fugitive particulate emissions

Applicable Compliance Method:

Compliance shall be determined using Method 22 of 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 6 months after permit issuance and within 6 months prior to permit expiration.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates and lead, and the allowable visible particulate emissions limitation.
  - c. The following parameters, at a minimum, shall be monitored and recorded during the emissions testing: the pressure drop across the baghouse and the ratio of lead addition, in pounds, to steel processed, in pounds.
  - d. The following test methods shall be employed to demonstrate compliance with the allowable emission limitations:
    - i. for visible particulate emissions limitation(s), Method 9 of 40 CFR Part 60, Appendix A;
    - ii. for the hourly mass emission rate for particulates, Method 5 of 40 CFR Part 60, Appendix A; and
    - iii. for the hourly mass emission rate for lead, Method 12 of 40 CFR Part 60, Appendix A.
  - e. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the CCHD, APCD.

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## VI. Miscellaneous Requirements

1. The baghouse serving this emissions unit also serves the other lead teeming line (emissions unit P005).

**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:** CRP - Ladle Metallurgical Facility (LMF) (P123)

**Activity Description:** Ladle Metallurgical Facility

#### 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>
ladle metallurgy facility (LMF) controlled with a baghouse (BGHS20)	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.a below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.a below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05 (PTI 15-1314) and OAC rules 3745-31-10 through 3745-31-20	<p>0.005 grain of particulate emissions per dry standard cubic foot of exhaust gases</p> <p>3.12 lbs/hr of particulate emissions (based on 72,800 dry standard cubic feet of exhaust gases per minute)</p> <p>13.67 tpy of particulate emissions</p> <p>2.44 lbs/hr of PM10</p> <p>10.69 tpy of PM10</p> <p>See A.I.2.b below.</p> <p>Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.</p> <p>525 lbs of SO2 in any 3-hour period based upon a rolling, 3-hour summation of the hourly emissions</p> <p>1,748 lbs of SO2 in any 24-hour period based upon a rolling, 24-hour summation of the hourly emissions</p> <p>318.94 tons of SO2 in any 1-year period based upon a rolling, 12-month summation of the hourly emissions</p> <p>See A.II.3, A.II.4 and A.II.5 below for sulfur usage restrictions.</p> <p>See A.I.2.c below.</p>

**2. Additional Terms and Conditions**

- 2.a** The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- 2.b** The baghouse serving this emissions unit also serves emissions units P128 and P129. The above particulate emission limitations are for the combined emissions from all three of these emissions units.
- 2.c** The terms and conditions for this emissions unit were established in the federally enforceable PTI #15-1314. The BAT determination for this emissions unit includes compliance with the Prevention of Significant Deterioration (PSD) requirements.

## II. Operational Restrictions

1. The LMF shall be equipped with a fabric filter baghouse control system which shall be designed to achieve and maintain an average flow rate of 72,800 dry standard cubic feet per minute and a maximum particulate emission rate of 0.005 grain per dry standard cubic foot of exhaust gases.
2. The pressure drop across the baghouse shall be maintained within the range of 6 to 15 inches of water while the emissions unit is in operation.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

3. The SO<sub>2</sub> mass emission limitations for this emissions unit and the sulfur addition restrictions are based on an emission factor of 0.80 ton of SO<sub>2</sub> emissions/ton of sulfur added to the steel, as determined by mass balance and based on the assumption that all the excess sulfur is converted to SO<sub>2</sub>. Some additional SO<sub>2</sub> is also generated from the sulfur already present in the steel prior to sulfur additions at this emissions unit. This SO<sub>2</sub> emission factor may be adjusted based on stack tests performed for this emissions unit.
4. All sulfur additions in the LMF shall be done by injecting the material under the surface of the molten steel. This may include, but is not limited to, wire injection.
5. Based on the emission factor of 0.8 lb of SO<sub>2</sub>/lb of sulfur added, the following sulfur addition rates shall not be exceeded:
  - a. no more than 656 pounds of sulfur additions in any 3-hour period;
  - b. no more than 2,185 pounds of sulfur additions in any 24-hour period; and
  - c. no more than 399 tons of sulfur additions in any rolling, 12-month period.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain hourly records of the following information for this emissions unit:
  - a. hourly records of sulfur additions;
  - b. the rolling, 3-hour rates of sulfur additions; and
  - c. the rolling, 24-hour rates of sulfur additions.
2. The permittee shall maintain monthly records of the total sulfur additions during the calendar month and the rolling, 12-month summation of the sulfur addition figures.
3. The permittee shall operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
  - a. each rolling, 3-hour period during which the sulfur addition rate in this emissions unit exceeded 656 pounds, and the actual sulfur usage for each such 3-hour period;
  - b. each rolling, 24-hour period during which the sulfur addition rate in this emissions unit exceeded 2,185 pounds, and the actual sulfur usage for each such 24-hour period;
  - c. each rolling, 12-month period during which the sulfur addition rate in this emissions unit exceeded 318.94 tons, and the actual sulfur usage for each such 12-month period; and
  - d. all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall also submit annual reports which specify the total SO<sub>2</sub> emissions, in tons, from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitations:

0.005 grain of particulate emissions per dry standard cubic foot of exhaust gases and 3.12 lbs/hr of particulate emissions (combined total for emissions units P123, P128, and P129)

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Method 5.
  - 1.b Emission Limitations:

2.44 lbs/hr of PM<sub>10</sub>

Applicable Compliance Method:

40 CFR Part 51, Appendix M, Method 201 (see A.V.2.f)
  - 1.c Emission Limitation:

5% opacity as a 6-minute average

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Method 9

## V. Testing Requirements (continued)

### 1.d Emission Limitation:

525 lbs of SO<sub>2</sub> in any 3-hour period based upon a rolling, 3-hour summation of the hourly emissions

1,748 lbs of SO<sub>2</sub> in any 24-hour period based upon a rolling, 24-hour summation of the hourly emissions

318.94 tons of SO<sub>2</sub> in any 1-year period based upon a rolling, 12-month summation of the hourly emissions

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Method 6

Sulfur addition restrictions shall be used to ensure ongoing compliance. Multiply the SO<sub>2</sub> emission factor of 0.8 lb of SO<sub>2</sub>/lb of sulfur added by the actual sulfur usage as recorded in section A.III.1. This SO<sub>2</sub> emission factor may be adjusted based on the results of future emissions tests.

### 1.e Emission Limitation:

13.67 tpy of particulate emissions (combined total for emissions units P123, P128, and P129)

10.69 tpy of PM<sub>10</sub>

Applicable Compliance Method:

The ton per year limitations were developed by multiplying the lbs/hr limitations by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

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

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates, PM<sub>10</sub>, and SO<sub>2</sub>.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

i. for particulates, Method 5 of 40 CFR Part 60, Appendix A;

ii. for PM<sub>10</sub>, Method 201 of 40 CFR Part 51, Appendix M; and

iii. for SO<sub>2</sub>, Method 6, of 40 CFR Part 60, Appendix A.

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 CCHD, APCD.

e. The parametric monitoring requirements established in sections A.III.1 and A.III.5 shall be checked during the emissions test as well as the amount, in pounds, of the sulfur addition.

f. If the test results show particulate emissions exceed the PM<sub>10</sub> emission limit, then the permittee shall perform a particle size distribution to determine the fraction of the PM<sub>10</sub> present in the sample which was collected via Method 5.

## **V. Testing Requirements (continued)**

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

Personnel from the appropriate CCHD, APCD 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 CCHD, APCD within 30 days following completion of the test(s).

## **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:** CRP - Reheat Furnace (P126)  
**Activity Description:** Natural Gas fired reheat furnace and rolling mill

#### 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>
Bloom reheat furnace with a capacity of 196.2 mmBtu/hr; fired with natural gas	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.a below.
	OAC rule 3745-31-05 (PTI 15-1314) and OAC rules 3745-31-10 through 3745-31-20	Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.  1 lb/hr of particulate emissions 4.4 tpy of particulate emissions  0.12 lb/hr of sulfur dioxide (SO <sub>2</sub> ) 0.52 tpy of SO <sub>2</sub>  0.112 lb of nitrogen oxides (NO <sub>x</sub> ) per mmBtu of actual heat input 22 lbs/hr of NO <sub>x</sub> 96.2 tpy of NO <sub>x</sub>  7.8 lbs/hr of carbon monoxide (CO) 34.3 tpy of CO  1.1 lbs/hr of volatile organic compounds (VOC) 4.82 tpy of VOC
		See A.I.2.b below.

##### 2. Additional Terms and Conditions

- The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- The terms and conditions of this permit were established in the federally enforceable permit to install 15-1314 issued on June 17, 1998. The BAT determination includes compliance with the Prevention of Significant Deterioration requirements.

## II. Operational Restrictions

1. The permittee shall only burn natural gas as fuel in this emissions unit.
2. The permittee shall only operate this emissions unit with low NOx burners rated at 0.112 lb of NOx per mmBtu or lower.

## III. Monitoring and/or Record Keeping Requirements

None

## IV. Reporting Requirements

None

## V. Testing Requirements

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

- 1.a Emission Limitation:

5% opacity as a 6-minute average

Applicable Compliance Method:

40 CFR Part 60, Appendix A, Method 9

- 1.b Emission Limitation:

1 lb/hr of particulate emissions

Applicable Compliance Method:

The AP42 particulate emission factor obtained from Table 1.4-2 of 1.9 lbs of particulates/million cubic feet of natural gas converts to 0.4 lb/hr of particulates. If required, compliance shall be determined using Method 5 of 40 CFR Part 60, Appendix A.

- 1.c Emission Limitation:

0.12 lb/hr of SO<sub>2</sub>

Applicable Compliance Method:

The AP42 SO<sub>2</sub> emission factor obtained from Table 1.4-1 of 0.6 lb of SO<sub>2</sub> per million cubic feet converts to 0.12 lb/hr of SO<sub>2</sub>. If required, compliance shall be determined using Method 6 of 40 CFR Part 60, Appendix A.

- 1.d Emission Limitation:

0.112 lb of NOx per mmBtu of actual heat input  
22 lbs/hr of NOx

Applicable Compliance Method:

The stack test conducted on January 19, 1996 showed an average NOx emission rate of only 2 lbs/hr. If required, further demonstrations of compliance shall be performed using Method 7 of 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

**1.e** Emission Limitation:

7.8 lbs/hr of CO

Applicable Compliance Method:

The stack test CO emission factor of 9 lbs of CO per million cubic feet converts to 1.8 lbs/hr of CO. This stack test factor was obtained from testing of a 228 mmBtu/hr Bloom reheat furnace at Timken Steel in March of 1999. If required, compliance shall be determined using Method 10 of 40 CFR Part 60, Appendix A.

**1.f** Emission Limitation:

1.1 lb/hr of VOC

Applicable Compliance Method:

The AP42 VOC emission factor obtained from Table 1.4-2 of 5.5 lbs of VOC per million cubic feet converts to 1.1 lbs/hr of VOC. If required, compliance shall be determined using Method 25 or Method 25A of 40 CFR Part 60, Appendix A.

**1.g** Emission Limitation:

96.2 tpy of NO<sub>x</sub>  
34.3 tpy of CO  
4.4 tpy of particulate emissions  
4.82 tpy of VOC  
0.52 tpy of SO<sub>2</sub>

Applicable Compliance Method:

The tpy emission limitations were developed by multiplying the lb(s)/hr limitations by the maximum operating schedule of 8,760 hours/year, and dividing by 2,000 pounds/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

## 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:** CRP - Alloy Truck Dumping (P128)  
**Activity Description:** Alloy Truck Dumping

#### 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>
cast-roll alloy truck dumping, controlled by the LMF baghouse (BGH20)	OAC rule 3745-31-05 (synthetic minor PTI 15-1093)	See A.I.2.a and A.I.2.b below.
	OAC rule 3745-17-07(A)(1)	See A.I.2.c below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.d below.
	OAC rule 3745-17-08(B)	See A.I.2.e below.
	OAC rule 3745-17-11	See A.I.2.d below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed ten percent opacity as a three-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.b This emissions unit shall be vented to the LMF (P123) fabric filter baghouse (BGH20). The total allowable emission rate from the exhaust stack of the LMF baghouse is restricted to 0.005 gr/dscf and 13.67 tpy of particulate emissions.
- 2.c Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.d The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirements specified in OAC rule 3745-31-05.
- 2.e The permittee shall minimize or eliminate visible particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: localized hooding at the alloy dump station.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 6 to 15 inches of water while the emissions unit is in operation.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above, as well as the corrective actions that were taken to achieve compliance.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

- 1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined using USEPA Method 9 from 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

### 1.b Emission Limitation:

10% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined using USEPA Method 9 from 40 CFR Part 60, Appendix A. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

### 1.c Emission Limitation:

The total allowable emission rate from the exhaust stack of the LMF baghouse is restricted to 0.005 grain of particulate emissions per dry standard cubic foot of exhaust gases (combined for emissions units P123, P128, and P129)

Applicable Compliance Method:

Compliance shall be determined as outlined in the terms and conditions for emissions unit P123. Compliance shall be determined using Method 5 of 40 CFR Part 60, Appendix A.

### 1.d Emission Limitation:

13.67 tpy of particulate emissions (combined total for emissions units P123, P128, and P129)

Applicable Compliance Method:

The allowable limit of 0.005 gr/dscf converts to an emission rate of 3.12 lbs/hr. The tpy limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

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

a. The emission testing shall be conducted within 6 months prior to permit expiration.

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

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates, Method 5 of 40 CFR Part 60, Appendix A.

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 CCHD, APCD.

e. The following parameter shall also be monitored during the emissions test: pressure drop across the baghouse.

## **V. Testing Requirements (continued)**

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

Personnel from the appropriate CCHD, APCD 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 CCHD, APCD within 30 days following completion of the test(s).

## **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:** CRP - Alloy Conveying and Silos (P129)  
**Activity Description:** Alloy Conveying and Silos

#### 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>
cast-roll alloy conveying and silos, controlled by the LMF baghouse (BGH20)	OAC rule 3745-31-05 (PTI 15-1093)	See A.I.2.a and A.I.2.b below.
	OAC rule 3745-17-07(A)(1)	See A.I.2.c below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.d below.
	OAC rule 3745-17-08(B)	See A.I.2.e below.
	OAC rule 3745-17-11	See A.I.2.d below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any fugitive dust source shall not exceed ten per cent opacity as a three-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.b This emissions unit shall be vented to the LMF (P123) fabric filter baghouse (BGHS20). The total allowable emission rate from the exhaust stack of the baghouse is restricted to 0.005 gr/dscf and 13.67 tpy of particulate emissions.
- 2.c Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.d The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirements specified in OAC rule 3745-31-05.
- 2.e The permittee shall minimize or eliminate visible particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the following: localized hooding at each transfer point on the conveying system.

The collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 6 to 15 inches of water while the emissions unit is in operation.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above, as well as the corrective actions that were taken to achieve compliance.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

- 1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined using USEPA Method 9 from 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

### 1.b Emission Limitation:

10% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined using USEPA Method 9 from 40 CFR Part 60, Appendix A. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.

### 1.c Emission Limitation:

The total allowable emission rate from the exhaust stack of the LMF baghouse is restricted to 0.005 gr/dscf (combined for emissions units P123, P128, and P129).

Applicable Compliance Method:

Compliance shall be determined using Method 5 of 40 CFR Part 60, Appendix A.

### 1.d Emission Limitation:

13.67 tpy of particulate emissions (combined total for emissions units P123, P128, and P129)

Applicable Compliance Method:

The allowable limit of 0.005 gr/dscf converts to an emission rate of 3.12 lbs/hr. The tpy limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

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

- a. The emission testing shall be conducted within 6 months prior to permit expiration.
- b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates, Method 5 of 40 CFR Part 60, Appendix A.
- 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 CCHD, APCD.
- e. The following parameter shall also be monitored during the emissions test: the pressure drop across the baghouse.

## **V. Testing Requirements (continued)**

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

Personnel from the appropriate CCHD, APCD 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 CCHD, APCD within 30 days following completion of the test(s).

## **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:** #4 EAF - #3 Melt Shop (P902)  
**Activity Description:** Electric arc steel making 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>
28.2 tons/hr electric arc furnace #4 controlled by the #3 melt shop baghouse (BGH02)	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)(3)	0.0052 grain of particulate emissions per dry standard cubic foot (gr/dscf) of exhaust gases
	OAC rule 3745-18-06(E)(1)	See A.I.2.c and A.I.2.d below. 187.4 lbs/hr of sulfur dioxide (SO <sub>2</sub> )

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building enclosing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall consist of the following:

- i. capture of fugitive particulate emissions using canopy hoods; and
- ii. control of fugitive particulate emissions using a baghouse with an outlet emission rate of not greater than 0.0052 gr/dscf.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

## 2. Additional Terms and Conditions (continued)

- 2.d Emissions units F003, P064, P068, P902, P903, and Z027 shall be vented to the #3 melt shop baghouse. The total allowable outlet emission rate from this baghouse, in accordance with the RACM determination, shall not exceed 0.0052 gr/dscf.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 2 to 9 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established during the next emission testing required in section A.V.2. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 1 month after completion of the emissions testing.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1, as well as the corrective actions that were taken to achieve compliance.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
20% opacity as a 6-minute average  
  
Applicable Compliance Method:  
  
Compliance shall be determined 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).
  - 1.b Emission Limitation:  
  
20% opacity as a 3-minute average  
  
Applicable Compliance Method:  
  
Compliance shall be determined 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)(4). The points of observation for visible emissions shall include any non-stack egress points from the building enclosing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.
  - 1.c Emission Limitation:  
  
187.4 lbs/hr of SO<sub>2</sub>  
  
Applicable Compliance Method:  
  
Compliance shall be determined using Method 6 of 40 CFR Part 60, Appendix A. Based on the FIRE (version 6.22, dated 10/99) emission factor of 0.01 lb SO<sub>2</sub>/ton for electric arc furnaces, actual SO<sub>2</sub> emissions are expected to be much less than the allowable SO<sub>2</sub> emission rate.
  - 1.d Emission Limitation:  
  
0.0052 gr/dscf of particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be determined using Method 5 of 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months after issuance of the permit and within 6 months prior to permit expiration.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and sulfur dioxide and the visible emissions limitations.
  - c. The following parameters shall also be monitored and recorded during the emissions testing: the process weight rate (in tons); and the pressure drop across the baghouse.
  - d. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
    - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A;
    - ii. for the grain loading emission rate for particulate emissions, Method 5 of 40 CFR Part 60, Appendix A; and
    - iii. for the hourly mass emission rate for sulfur dioxide, Method 6 of 40 CFR Part 60, Appendix A.
  - e. 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 CCHD, APCD.

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

Personnel from the appropriate CCHD, APCD 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 CCHD, APCD within 30 days following completion of the test(s).

## 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:** #5 EAF - #3 Melt Shop (P903)  
**Activity Description:** Electric arc steel making 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>
28.2 tons/hr electric arc furnace #5 controlled by the #3 melt shop baghouse (BGH02)	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)(3)	0.0052 grain of particulate emissions per dry standard cubic foot (gr/dscf) of exhaust gases
	OAC rule 3745-18-06(E)(1)	See A.I.2.c and A.I.2.d below. 187.4 lbs/hr of sulfur dioxide (SO <sub>2</sub> )

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building enclosing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall consist of the following:

- i. capture of fugitive particulate emissions using canopy hoods; and
- ii. control of fugitive particulate emissions using a baghouse with an outlet emission rate of not greater than 0.0052 gr/dscf.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d Emissions units F003, P064, P068, P902, P903, and Z027 shall be vented to the #3 melt shop baghouse. The total allowable outlet emission rate from this baghouse, in accordance with the RACM determination, shall not exceed 0.0052 gr/dscf.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 2 to 9 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established during the next emission testing required in section A.V.2. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 1 month after completion of the emissions testing.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.2, as well as the corrective actions that were taken to achieve compliance.
2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(4). The points of observation for visible emissions shall include any non-stack egress points from the building enclosing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

187.4 lbs/hr of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be determined using Method 6 of 40 CFR Part 60, Appendix A. Based on the FIRE (version 6.22, dated 10/99) emission factor of 0.01 lb SO<sub>2</sub>/ton for electric arc furnaces, actual SO<sub>2</sub> emissions are expected to be much less than the allowable SO<sub>2</sub> emission rate.

**1.d** Emission Limitation:

0.0052 gr/dscf of particulate emissions

Applicable Compliance Method:

Compliance shall be determined using Method 5 of 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months after issuance of the permit and within 6 months prior to permit expiration.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and sulfur dioxide and the visible emissions limitations.
  - c. The following parameters shall also be monitored and recorded during the emissions testing: the process weight rate (in tons); and the pressure drop across the baghouse.
  - d. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
    - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A;
    - ii. for the grain loading emission rate for particulate emissions, Method 5 of 40 CFR Part 60, Appendix A; and
    - iii. for the hourly mass emission rate for sulfur dioxide, Method 6 of 40 CFR Part 60, Appendix A.
  - e. 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 CCHD, APCD.

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

Personnel from the appropriate CCHD, APCD 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 CCHD, APCD within 30 days following completion of the test(s).

## 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:** #6 EAF - #4 Melt Shop (P904)  
**Activity Description:** Electric arc steel making 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>
THIS EMISSIONS UNIT HAS BEEN PERMANENTLY SHUTDOWN AND WILL BE REMOVED FROM THE PERMIT RECOMMENDATION UPON RECEIPT OF THE REVISED APPLICATION.	OAC rule 3745-31-05 (PTI 15-1314) and OAC rules 3745-31-10 through 3745-31-20	0.0032 grain of particulate emissions per dry standard cubic foot of exhaust gases 249 tpy of particulate emissions  43.17 lbs/hr of PM10 189.24 tpy of PM10  5.95 lbs/hr of sulfur dioxide (SO2) 26.1 tpy of SO2  8.5 lbs/hr of nitrogen oxides (NOx) 37.2 tpy of NOx  340 lbs/hr of carbon monoxide (CO) 1,489.2 tpy of CO  29.75 lbs/hr of volatile organic compounds (VOC) 130.3 tpy of VOC  0.024 lb/hr of lead (Pb) 0.1 tpy of Pb (combined emissions from either P904 & P905 or P904 & P907)  See A.I.2.a, A.I.2.b, and A.I.2.c below.
	OAC rule 3745-17-07(A)	See A.I.2.d below.
	OAC rule 3745-17-07(B)	See A.I.2.d below.
	OAC rule 3745-17-08(B)	See A.I.2.e below.
	OAC rule 3745-17-11 (Figure II)	56.8 lbs/hr of particulates  See A.I.2.f below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.d below.

## 2. Additional Terms and Conditions

- 2.a** Emissions unit P904 was shut down and the emissions reductions were used for "netting" credits for the securement of permit to install 15-1314. However, a federally enforceable administrative modification of PTI 15-1314 issued draft and then final on August 11, 1999 established emissions unit P904 to be only operated as a standby furnace. Only two of the three furnaces (P904, P905, and P907) in the #4 melt shop shall be operated at the same time. In order to ensure that the operation of emissions unit P904 will not generate emissions above the allowable limits established for emissions units P905 and P907, as established in the above noted PTI, emissions unit P904 shall be subject to the emissions limitations established in the PTI for emissions unit P905. The BAT determination includes compliance with the Prevention of Significant Deterioration requirements.
- 2.b** In accordance with PTI 15-1314, visible particulate emissions from the baghouse (BGH01) exit shall not exceed 3% opacity as a 6-minute average.
- 2.c** In accordance with PTI 15-1314, visible fugitive particulate emissions shall not exceed 6% opacity as a 6-minute average from the #4 melt shop and shall not exceed 10% opacity as a 6-minute average from the dust handling equipment.
- 2.d** The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirements specified in OAC rule 3745-31-05.
- 2.e** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
- i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, and vent the fugitive dust; and
  - ii. the collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- At a minimum, the permittee's employment of RACM, shall include the following:
- a. direct evacuation of the EAF; and
  - b. use of canopy hoods affixed to the roof of the melt shop (i.e. building evacuation system).
- 2.f** The allowable hourly particulate emission limit was determined by considering emissions units P904, P905, P907, and P106 as similar emissions units. Since P904 is a standby unit only, the total (for P905, P907, P106) uncontrolled mass rate of emissions (UMRE) is 7,232 lbs/hr based on an emission factor of 11.3 lbs of particulates/ton.
- 2.g** The emissions from P904 shall be vented to the no. 4 melt shop baghouse. This baghouse shall have a minimum control efficiency of 99%. In addition, the system shall achieve a minimum capture efficiency that is sufficient to prevent a violation of the 6% opacity limit for fugitive emissions from the melt shop. The capture system for the emissions unit shall include a common canopy hood and a roof control system, both of which vent to the no. 4 melt shop baghouse. This capture system shall also achieve a minimum capture efficiency of 99% for CO and VOC emissions.

## II. Operational Restrictions

1. No more than 85 tons of steel per hour shall be processed in emissions unit P904. This production rate is an average hourly rate determined by dividing the tons of steel produced per day by the number of operating hours per day.
2. Since emissions unit P904 (EAF no. 6) is required by PTI 15-1314 to be only operated as a standby EAF, this emissions unit, P904, is prohibited from being operated at the same time that both P905 (EAF no. 7) and P907 (EAF no. 9) are being operated.

## II. Operational Restrictions (continued)

3. The damper positions for the baghouse shall be maintained in a position in the range of 45 to 81 percent. The baghouse fan motor amperes shall be maintained at 428 amps for the #1 fan and 455 amps for fans #2, 3, 4, and 6. The values of these parameters shall be maintained at the appropriate levels during operation. Operation at other than baseline values will be considered by the Ohio EPA, DAPC to be unacceptable operation and maintenance of the control system.

The permittee may petition the Ohio EPA for reestablishment of these parameters whenever the permittee can demonstrate to the Agency's satisfaction that the operating conditions upon which the parameters were previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The following are some of the requirements for emissions units P905 and P907 as established in PTI 15-1314 and will be applicable to emissions unit P904 when in operation. Observations of the opacity of the visible emissions from the control devices shall be performed by a certified visible emission observer as follows:

- 1.a Visible emission observations shall be conducted at least once per day of operation. The observations shall occur when the furnace is operating in the charging, melting, tapping, and refining period. These observations shall be taken in accordance with Method 9 of 40 CFR Part 60, Appendix A and, for at least four 6-minute periods, the opacity shall be recorded for point(s) where the greatest opacity visible emissions are observed, and that portion of the plume where the condensed water phase is not present in accordance with the procedures listed in Method 9 of 40 CFR Part 60, Appendix A. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emission, only one set of four 6-minute observations will 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. Records shall be maintained of any 6-minute average that is in excess of the opacity limits specified above.

The appropriate records shall be maintained in the permittee's files to identify the persons responsible for conducting the opacity readings and to verify that the Method 9 certifications are up to date for the responsible individuals.

2. For each day emissions unit P904 is in operation, the permittee shall monitor the operation of the furnace control systems and maintain records in accordance with the following requirements:
  - 2.a The permittee shall check and record on an hourly basis the control system fan motor amperes and damper positions.
  - 2.b The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture systems (i.e., dampers, and damper switches). This inspection 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 Ohio EPA, DAPC to approve any alternative to monthly operational status inspections that will provide a continuous record of the operation of each emission capture system.
3. The permittee shall maintain daily production records for emissions units P904, P905, and P907. These records, at a minimum, shall contain the following information:
  - a. the number of hours each emissions unit was in operation;
  - b. the tons of steel produced by each emissions unit; and
  - c. the average hourly production rate for each emissions unit, in tons of steel per hour, determined by dividing section A.III.3.b by section A.III.3.a.
4. The permittee shall maintain monthly records of the tons of steel produced during each calendar month.

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

5. The permittee shall perform daily checks when the emissions units in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly written deviation (excursion) reports of all exceedances of the opacity restrictions contained in section A.I.2 above. For the purposes of these reports, exceedances are defined as all 6-minute periods during which the average opacity exceeds these limits.
2. The permittee shall submit quarterly written deviation (excursion) reports that identify any operation of the control system damper positions outside of the range established in section A.II.3 and fan motor amperes at values other than the values established under section A.II.3.
3. The permittee shall submit quarterly written deviation (excursion) reports that identify any day in which the average hourly production rate of this EAF exceeded 85 tons/hr.
4. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e. windows, doors, roof monitors, etc.) serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

### V. Testing Requirements

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

**1.a** Emission Limitation:

56.8 lbs/hr of particulate emissions for the combined emissions from P904, P905, P907 and P106

43.17 lbs/hr of PM10 for the combined emissions from P904, P905, P907 and P106

BACT limit of 0.0032 grain of particulate emissions per dry standard cubic foot of exhaust gases from #4 melt shop baghouse

Applicable Compliance Method:

For particulates: Method 5 of 40 CFR Part 60, Appendix A

For PM10: Method 201 of 40 CFR Part 60, Appendix A

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

3% opacity as a 6-minute average from the baghouse exit  
6% opacity as a 6-minute average from the melt shop  
10% opacity as a 6-minute average from the dust-handling system

Applicable Compliance Method:

Method 9 of 40 CFR Part 60, Appendix A and the procedures of 40 CFR Part 60.11 shall be used to determine compliance with these opacity limits.

**1.c** Emission Limitation:

5.95 lbs/hr of SO<sub>2</sub>

Applicable Compliance Method:

Method 6 of 40 CFR Part 60, Appendix A

**1.d** Emission Limitation:

8.5 lbs/hr of NO<sub>x</sub>

Applicable Compliance Method:

Initial compliance shall be demonstrated using Method 7 of 40 CFR Part 60, Appendix A. Thereafter, provided compliance is achieved during the stack test, multiply the nitrogen oxides emission factor, in lb of NO<sub>x</sub> per ton of steel produced, established during the stack test (not to exceed 0.1 lb/ton of steel) by the actual average hourly steel processing rate (tons/hour).

**1.e** Emission Limitation:

340 lbs/hr of CO

Applicable Compliance Method:

Initial compliance shall be demonstrated using Method 10 of 40 CFR Part 60, Appendix A. Thereafter, provided compliance is achieved during the stack test, multiply the carbon monoxide emission factor, in pound(s) of CO per ton of steel produced, established during the stack test (not to exceed 4 lbs of CO/ton of steel) by the actual average hourly steel processing rate (tons/hour).

**1.f** Emission Limitation:

29.75 lbs/hr of VOC

Applicable Compliance Method:

Initial compliance shall be determined using Method 25 or Method 25A of 40 CFR Part 60, Appendix A. An emission factor of 0.35 lb of VOC/ton of steel comes from FIRE Version 5.0 SCC. (0.35 lb of VOC/ton X 85 tons/hr = 29.75 lbs/hr of VOC)

**1.g** Emission Limitation:

0.024 lb/hr of Pb (combined emissions from P904, P905, and P907)

Applicable Compliance Method:

Initial compliance shall be determined using Method 12 of 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

### 1.h Emission Limitation:

249 tpy of particulate emissions  
189.24 tpy of PM10  
26.1 tpy of SO<sub>2</sub>  
37.2 tpy of NO<sub>x</sub>  
1,489.2 tpy of CO  
130.3 tpy of VOC  
0.1 tpy of Pb

### Applicable Compliance Method:

The tpy emission limitations were developed by multiplying the lb/hr emission limitations by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. Provided that this emissions unit is used on a standby basis only, periodic testing will not be required. If, for any reason, this emissions unit is brought back into regular daily service on an annual basis, the emissions testing shall be performed within 3 months thereafter for the pollutants listed below.
  - b. The test(s) shall be conducted while emissions units P106, P904, and P907 are all operating at or near their maximum capacities, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).
  - c. With the exception of the furnace pressure monitoring, the parametric monitoring requirements established in PTI 15-1314 for P905 and P907 shall be checked during the emissions test for P904.

## V. Testing Requirements (continued)

d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

i. for particulates - Method 5 of 40 CFR Part 60, Appendix A;

(a) Method 5D shall be used for positive-pressure fabric filters to determine the particulate matter 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, when a single EAF is sampled, the sampling time shall include an integral number of heats.

(b) If the test results show that particulate emissions exceed the PM10 emission limit, then the permittee shall perform a particle size distribution to determine the fraction of the PM10 present in the composite sample which was collected via Method 5.

ii. for opacity - Method 9 of 40 CFR Part 60, Appendix A and the procedures of 40 CFR Part 60.11 shall be used to determine opacity;

(a) The Method 5 and Method 9 test runs shall be conducted concurrently, unless inclement weather interferes.

iii. for SO<sub>2</sub> - Method 6 of 40 CFR Part 60, Appendix A;

iv. for CO - Method 10 of 40 CFR Part 60, Appendix A;

v. for NO<sub>x</sub> - Method 7 of 40 CFR Part 60, Appendix A;

vi. for VOC - Method 25 of 40 CFR Part 60, Appendix A; and

vii. for Pb - Method 12 of 40 CFR Part 60, Appendix A.

Alternate test methods may be substituted with prior approval of the CCHD, APCD.

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

Personnel from the CCHD, APCD 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 CCHD, APCD within 30 days following completion of the test(s).

3. During the particulate emission test runs, the permittee shall obtain the following additional information:

i. The control system fan motor amperes, all damper positions, and 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 EAFs.

4. 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.

## **VI. Miscellaneous Requirements**

1. The emission limitations for emissions unit P904 are not part of the total facility emissions. These limitations are replacement limits when this emissions unit operates in place of either emissions unit P905 or P907. As part of the PSD analysis for the project associated with PTI 15-1314, emissions credits for the shutdown of P904 (EAF no. 6) were factored in; therefore, this emissions unit may only be operated as a standby unit in place of either P905 (EAF no. 7) or P907 (EAF no. 9). The permittee must utilize the operating records of P904, P905, and P907 to demonstrate that all three of these EAFs never operate simultaneously.

**B. State 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>
<p>83.15 tons/hour #6 electric arc furnace (EAF) controlled by the #4 melt shop baghouse (BGH01)</p>		

This is a standby furnace.

**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**

- An evaluation of air toxic emissions was performed by the permittee. With the exception of aluminum and zinc, emissions of other air toxic pollutants did not exceed one (1) ton per year. The air toxics analyses for Zn showed concentrations of only 1% of the MAGLC and for Al only 3% of the MAGLC. In the event that additional air toxic emissions should exceed one ton per year in the future, the permittee shall perform an evaluation to determine compliance with Ohio EPA's Air Toxics Policy.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** #7 EAF - #4 Melt Shop (P905)  
**Activity Description:** Electric arc steel making 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>
85 tons/hr electric arc furnace (EAF no. 7) with direct evacuation control (DEC) and a building evacuation system for capture and a baghouse (BGH01) for control	OAC rule 3745-31-05 (PTI 15-1314) and OAC rule 3745-31-10 through OAC rule 3745-31-20	0.0032 grain of particulate emissions per dry standard cubic foot of exhaust gases 249 tpy of particulate emissions
		See A.I.2.b below.
		43.17 lbs/hr of PM10 189.24 tpy of PM10
		5.95 lbs/hr of sulfur dioxide (SO2) 26.1 tpy of SO2
		8.5 lbs/hr of nitrogen oxides (NOx) 37.2 tpy of NOx
		340 lbs/hr of carbon monoxide (CO) 1,489.2 tpy of CO
		29.75 lbs/hr of volatile organic compounds (VOC) 130.3 tpy of VOC
		0.024 lb/hr of lead (Pb) 0.1 tpy of Pb (combined emissions from P905 & P907)
		See A.I.2.d for a clarification of the hourly and annual limits.
		See A.I.2.e below.
OAC rule 3745-17-07(A)(1)	See A.I.2.a below.	
OAC rule 3745-17-11	56.8 lbs/hr of particulate emissions	
	See A.I.2.b below.	
OAC rule 3745-18-06(E)(1)	See A.I.2.a below.	

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	40 CFR Part 60, Subpart AAa	See A.I.2.a below.
		See A.I.2.c below.

**2. Additional Terms and Conditions**

- 2.a** The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- 2.b** This is a combined limit for emissions from the baghouse servicing P905, P907, & P106. This limit is based upon considering P905, P907, & P106 as similar sources and using Figure II and an uncontrolled MRE of 7,232 lbs/hr based on an emission factor of 11.3 lbs PM/ton. Therefore, 56.8 lbs/hr X 8,760 hrs/yr X 1 ton/2,000 lbs = 249 tons/yr.
- 2.c** The following standards are requirements of the NSPS Subpart AAa, BACT and BAT. Visible emissions shall not exceed the following limits during a 6-minute average:
  - i. 3% opacity from the baghouse exit;
  - ii. 6% opacity from the melt shop [this limit is more restrictive than the NSPS limit which only limits emissions due solely to the operation of an EAF(s) or AOD vessel(s)]; and
  - iii. 10% opacity from the dust handling equipment.
- 2.d** The hourly emissions limits established for sulfur dioxide, nitrogen oxides, and carbon monoxide are based on the maximum hourly production rate of 85 tons of steel produced per hour.
- 2.e** The terms and conditions of this permit were established in the federally enforceable permit to install 15-1314 issued on June 17, 1998. The BAT determination for this emissions unit includes compliance with the Prevention of Significant Deterioration requirements.
- 2.f** The emissions from P905 shall be vented to the No. 4 Melt Shop Baghouse. This baghouse shall have a minimum control efficiency of 99%. In addition, the system shall achieve and maintain a minimum capture efficiency that is sufficient to prevent violations of the 6% opacity limit for fugitive emissions from the melt shop. The capture system for the emissions unit shall include a common canopy hood and a roof control system, both of which shall vent to the no. 4 melt shop baghouse. This capture system shall also achieve and maintain a minimum capture efficiency of 99% for CO and VOC emissions.

**II. Operational Restrictions**

- 1.** No more than 85 tons of steel per hour shall be processed in P905. This production rate is an average hourly rate determined by dividing the tons of steel produced per day by the number of operating hours per day.
- 2.** The permittee shall minimize the purchase of scrap material which is excessively oily or is coated with other combustible material in accordance with the permittee's Scrap Management Plan. All grades of scrap shall be free of excessive dirt, oil, and grease. Heavily oiled scrap shall not be used. In accordance with the SMP, the permittee shall operate a radionuclide detector which will be used to inspect all incoming scrap material into the facility. Radioactive scrap material shall not be used at this facility. Any scrap material which is determined to be radioactive shall be disposed of pursuant to the permittee's Radiation Management Program.

## II. Operational Restrictions (continued)

3. The static pressure in the the free space inside this emissions unit shall be maintained at a level which does not exceed 0.04 inches of water while the emissions unit is in operation. This static pressure level shall be maintained at all times when the EAF is operating in a meltdown and refining period. Operation at higher pressures shall be considered by the Ohio EPA, Division of Air Pollution Control (DAPC) to be unacceptable operation and maintenance of the control system.

The permittee may petition the Ohio EPA for reestablishment of the static pressure limitation whenever the permittee can demonstrate to the Agency's satisfaction that EAF operating conditions upon which the pressures were previously established are no longer applicable.

4. The damper positions for the baghouse shall be maintained in a position in the range of 45 to 81 percent. The baghouse fan motor amperes shall be maintained at 428 amps for the #1 fan and 455 amps for fans #2, 3, 4, and 6. The values of these parameters shall be maintained at the appropriate levels during operation. Operation at other than baseline values will be considered by the Ohio EPA, DAPC to be unacceptable operation and maintenance of the control system.

The permittee may petition the Ohio EPA for reestablishment of these parameters whenever the permittee can demonstrate to the Agency's satisfaction that the operating conditions upon which the parameters were previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. Observations of the opacity of the visible emissions, performed by a certified visible emission observer, from the outlet of the control device (BGH01) shall be conducted at least once per day of operation. The observations shall occur when the furnace is operating in the charging, melting, tapping, and refining period. These observations shall be taken in accordance with Method 9 of 40 CFR Part 60, Appendix A and, for at least four consecutive 6-minute periods, the opacity shall be recorded for point(s) where the greatest visible particulate emissions are observed, and that portion of the plume where the condensed water phase is not present in accordance with the procedures listed in Method 9 of 40 CFR Part 60, Appendix A. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one set of four consecutive 6-minute observations will 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. Records shall be maintained of any 6-minute average that is in excess of the opacity limit specified in section A.I.2.c.i.

The appropriate records shall be maintained in the permittee's files to identify the persons responsible for conducting the opacity readings and to verify that the Method 9 certifications are up to date for the responsible individuals.

2. The permittee shall monitor the operation of the furnace control systems and maintain records in accordance with the following requirements:
  - a. The permittee shall calibrate and maintain a monitoring device that allows the pressure in the free space inside the EAF to be monitored. The pressure monitoring device shall have an accuracy of plus or minus 5 mm of water gauge over its normal operating range and shall be calibrated according to the manufacturer's instructions.
  - b. On an hourly basis, the permittee shall check and record the furnace static pressure, and the control system fan motor amperes and damper positions.
  - c. 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). This inspection 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 Ohio EPA, DAPC to approve any alternative to monthly operational status inspections that will provide a continuous record of the operation of each emission capture system.
  - d. Upon approval by the USEPA, an alternative method may be established to replace the monitoring and record keeping requirements found in sections A.III.2.a, A.III.2.b, and A.III.2.c above.

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

3. The permittee shall maintain daily production records for this emissions unit. These records, at a minimum, shall contain the following information:
  - a. the number of hours each emissions unit was in operation;
  - b. the tons of steel produced by each emissions unit; and
  - c. the average hourly production rate for each emissions unit, in tons of steel per hour, determined by dividing section A.III.3.b by section A.III.3.a.
4. The permittee shall maintain monthly records of the tons of steel produced during each calendar month.
5. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly written deviation (excursion) reports that identify all exceedances of the opacity restrictions contained in section A.I.2.c.i above. For the purposes of these reports, exceedances are defined as all 6-minute periods during which the average opacity exceeds these limits.
2. The permittee shall submit quarterly written deviation (excursion) reports that identify all exceedances of the furnace static pressure value established in section A.II.3, any operation of the control system damper positions outside of the range established in section A.II.4, and fan motor amperes at values other than the values established under section A.II.4.
3. The permittee shall submit quarterly written deviation (excursion) reports that identify any day in which the average hourly production rate of this EAF exceeded 85 tons/hr.
4. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e., windows, doors, roof monitors, etc.) serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.
5. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

### V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

56.8 lbs/hr of particulate emissions for the combined emissions from emissions units P905, P907 and P106

43.17 lbs/hr of PM10 for the combined emissions from emissions units P905, P907 and P106

BACT limit of 0.0032 grain of particulate emissions per dry standard cubic foot of exhaust gases from the no. 4 melt shop baghouse

Applicable Compliance Method:

For particulate emissions - Method 5 of 40 CFR Part 60, Appendix A.

For PM10 - Method 201 of 40 CFR Part 60, Appendix A.

**1.b** Emission Limitation:

3% opacity from the baghouse exit

6% opacity from the melt shop

10% from the dust-handling system

Applicable Compliance Method:

Method 9, 40 CFR Part 60, Appendix A and the procedures of 40 CFR Part 60.11 shall be used to determine opacity as outlined in section A.III.1.

**1.c** Emission Limitation:

5.95 lbs/hr of SO<sub>2</sub>

Applicable Compliance Method:

Multiply the sulfur dioxide emission factor of 0.005 pound SO<sub>2</sub> per ton of steel produced, established during the March 24-26, 1999 stack test, by the actual average hourly steel processing rate (tons/hour). If required, a further demonstration of compliance shall be performed using Method 6, 40 CFR Part 60, Appendix A.

**1.d** Emission Limitation:

8.5 lbs/hr of NO<sub>x</sub>

Applicable Compliance Method:

Multiply the nitrogen oxides emission factor of 0.099 pound NO<sub>x</sub> per ton of steel produced, established during the March 24-26, 1999 stack test, by the actual average hourly steel processing rate (tons/hour). If required, a further demonstration of compliance shall be performed using Method 7, 40 CFR Part 60, Appendix A.

**1.e** Emission Limitation:

340 lbs/hr of CO

Applicable Compliance Method:

Multiply the carbon monoxide emission factor of 1.00 pound CO per ton of steel produced, established during the March 24-26, 1999 stack test, by the actual average hourly steel processing rate (tons/hour). If required, a further demonstration of compliance shall be performed using Method 10, 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

**1.f** Emission Limitation:

29.75 lbs/hr of VOC

Applicable Compliance Method:

Multiply the VOC emission factor of 0.088 pound VOC per ton of steel produced, established during the March 24-26, 1999 stack test, by the actual average hourly steel processing rate (tons/hour). If required, a further demonstration of compliance shall be performed using Method 25 or Method 25A, 40 CFR Part 60, Appendix A.

**1.g** Emission Limitation:

0.024 lb/hr of Pb for combined emissions from P905 and P907

Applicable Compliance Method:

Compliance shall be determined by Method 12, 40 CFR Part 60, Appendix A.

**1.h** Emission Limitations:

249 tpy of particulate emissions  
189.24 tpy of PM10  
26.1 tpy of SO<sub>2</sub>  
37.2 tpy of NO<sub>x</sub>  
1,489.2 tpy of CO  
130.3 tpy of VOC  
0.1 tpy of Pb

Applicable Compliance Method:

The tpy limitations were developed by multiplying the lbs/hr limitations by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

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

a. The emission testing shall be conducted within 6 months prior to permit expiration for the pollutants listed in section A.V.2.e below.

b. The test(s) shall be conducted while emissions units P106, P905, and P907 are all operating at or near their maximum capacities, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

c. The parametric monitoring requirements established in sections A.II.4 and A.II.5 shall be checked during the emissions test.

d. 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.

## V. Testing Requirements (continued)

e. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

i. for particulates - Method 5 of 40 CFR Part 60, Appendix A;

(a) Method 5D shall be used for positive-pressure fabric filters to determine the particulate matter 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, when a single EAF is sampled, the sampling time shall include an integral number of heats.

(b) If the test results show particulate emissions exceed the PM10 emission limit, then the permittee shall perform a particle size distribution to determine the fraction of the PM10 present in the sample which was collected via Method 5.

ii. for opacity - Method 9 of 40 CFR Part 60, Appendix A and the procedures of 40 CFR Part 60.11 shall be used to determine opacity;

(a) The Method 5 and Method 9 test runs shall be conducted concurrently, unless inclement weather interferes.

iii. for SO<sub>2</sub> - Method 6 of 40 CFR Part 60, Appendix A;

iv. for CO - Method 10 of 40 CFR Part 60, Appendix A;

v. for NO<sub>x</sub> - Method 7 of 40 CFR Part 60, Appendix A;

vi. for VOC - Method 25 of 40 CFR Part 60, Appendix A;

vii. for Pb - Method 12 of 40 CFR Part 60, Appendix A; and

viii. for PM<sub>10</sub> - Method 201 of 40 CFR Part 60, Appendix A.

Alternate test methods may be substituted with prior approval of the CCHD, APCD.

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

Personnel from the CCHD, APCD 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 CCHD, APCD within 30 days following completion of the test(s).

## VI. Miscellaneous Requirements

**None**

**B. State 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>
85 tons/hr electric arc furnace (EAF no. 7) with direct evacuation control (DEC) and a building evacuation system for capture and a baghouse for control		

**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**

- An evaluation of air toxic emissions was performed by the permittee. With the exception of aluminum and zinc, emissions of other air toxic pollutants did not exceed one (1) ton per year. The air toxics analyses for Zn showed concentrations of only 1% of the MAGLC and for Al only 3% of the MAGLC. In the event that additional air toxic emissions should exceed one ton per year in the future, the permittee shall perform an evaluation to determine compliance with Ohio EPA's Air Toxics Policy.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** #9 EAF - #4 Melt Shop (P907)  
**Activity Description:** Electric arc steel making 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>
165 tons/hr electric arc furnace (EAF no. 9) with direct evacuation control (DEC) and a building evacuation system for capture and a baghouse (BGH01) for control	OAC rule 3745-31-05 (PTI 15-1314) and OAC rule 3745-31-10 through OAC rule 3745-31-20	0.0032 grain of particulate emissions per dry standard cubic foot of exhaust gases
		249 tpy of particulate emissions
		See A.I.2.b below.
		43.17 lbs/hr of PM10
		189.24 tpy of PM10
		11.55 lbs/hr of sulfur dioxide (SO <sub>2</sub> )
		50.6 tpy of SO <sub>2</sub>
		16.5 lbs/hr of nitrogen oxides (NO <sub>x</sub> )
		72.3 tpy of NO <sub>x</sub>
		660 lbs/hr of carbon monoxide (CO)
2,890.8 tpy of CO		
57.75 lbs/hr of volatile organic compounds (VOC)		
252.9 tpy of VOC		
0.024 lb/hr of lead (Pb)		
0.1 tpy of Pb		
(combined emissions from P905 & P907)		
See A.I.2.d for a clarification of the hourly and annual limits.		
See A.I.2.e below for clarification of BAT.		
OAC rule 3745-17-07(A)(1)	See A.I.2.a below.	
OAC rule 3745-17-11	56.8 lbs/hr of particulate emissions	
	See A.I.2.b below.	

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-18-06(E)(1)	See A.I.2.a below.
	40 CFR Part 60, Subpart AAa	See A.I.2.a below.
		See A.I.2.c below.

**2. Additional Terms and Conditions**

- 2.a** The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- 2.b** This is a combined limit for emissions from the baghouse servicing P905, P907, & P106. This limit is based upon considering P905, P907, & P106 as similar sources and using Figure II and an uncontrolled MRE of 7,232 lbs/hr based on an emission factor of 11.3 lbs PM/ton. Therefore, 56.8 lbs/hr X 8,760 hrs/yr X 1 ton/2,000 lbs = 249 tons/yr.
- 2.c** The following standards are requirements of the NSPS Subpart AAa, BACT and BAT. Visible emissions shall not exceed the following limits during a 6-minute average:
  - i. 3% opacity from the baghouse exit;
  - ii. 6% opacity from the melt shop [this limit is more restrictive than the NSPS limit which only limits emissions due solely to the operation of an EAF(s) or AOD vessel(s)]; and
  - iii. 10% opacity from the dust handling equipment.
- 2.d** The hourly emissions limits established for sulfur dioxide, nitrogen oxides, and carbon monoxide are based on the maximum hourly production rate of 165 tons of steel produced per hour.
- 2.e** The terms and conditions of this permit were established in the federally enforceable permit to install 15-1314 issued on June 17, 1998. The BAT determination includes compliance with the Prevention of Significant Deterioration requirements.
- 2.f** The emissions from P905 shall be vented to the No. 4 Melt Shop Baghouse. This baghouse shall have a minimum control efficiency of 99%. In addition, the system shall achieve and maintain a minimum capture efficiency that is sufficient to prevent violations of the 6% opacity limit for fugitive emissions from the melt shop. The capture system for the emissions unit shall include a common canopy hood and a roof control system, both of which shall vent to the no. 4 melt shop baghouse. The capture system shall also achieve and maintain a minimum capture efficiency of 99% for CO and VOC emissions.

**II. Operational Restrictions**

- 1.** No more than 165 tons of steel per hour shall be processed in P907. This production rate is an average hourly rate determined by dividing the tons of steel produced per day by the number of operating hours per day.
- 2.** The permittee shall minimize the purchase of scrap material which is excessively oily or is coated with other combustible material in accordance with the permittee's Scrap Management Plan. All grades of scrap shall be free of excessive dirt, oil, and grease. Heavily oiled scrap shall not be used. In accordance with the SMP, the permittee shall operate a radionuclide detector which will be used to inspect all incoming scrap material into the facility. Radioactive scrap material shall not be used at this facility. Any scrap material which is determined to be radioactive shall be disposed of pursuant to the permittee's Radiation Management Program.

## II. Operational Restrictions (continued)

3. The static pressure in the free space inside this emissions unit shall be maintained at a level which shall not exceed 0.04 inches of water while the emissions unit is in operation. The pressure level shall be maintained at all times when the EAF is operating in a meltdown and refining period. Operation at higher pressures shall be considered by the Ohio EPA, Division of Air Pollution Control (DAPC) to be unacceptable operation and maintenance of the control system.

The permittee may petition the Ohio EPA for reestablishment of the static pressure limitation whenever the permittee can demonstrate to the Agency's satisfaction that EAF operating conditions upon which the pressures were previously established are no longer applicable.

4. The damper positions for the baghouse shall be maintained in a position in the range of 45 to 81 percent. The baghouse fan motor amperes shall be maintained at 428 amps for the #1 fan and 455 amps for fans #2, 3, 4, and 6. The values of these parameters shall be maintained at the appropriate levels during operation. Operation at other than baseline values will be considered by the Ohio EPA, DAPC to be unacceptable operation and maintenance of the control system.

The permittee may petition the Ohio EPA for reestablishment of these parameters whenever the permittee can demonstrate to the Agency's satisfaction that the operating conditions upon which the parameters were previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. Observations of the opacity of the visible emissions, performed by a certified visible emission observer, from the outlet of the control device (BGH01) shall be conducted at least once per day of operation. The observations shall occur when the furnace is operating in the charging, melting, tapping, and refining period. These observations shall be taken in accordance with Method 9 of 40 CFR Part 60, Appendix A and, for at least four consecutive 6-minute periods, the opacity shall be recorded for point(s) where the greatest visible particulate emissions are observed, and that portion of the plume where the condensed water phase is not present in accordance with the procedures listed in Method 9 of 40 CFR Part 60, Appendix A. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one set of four consecutive 6-minute observations will 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. Records shall be maintained of any 6-minute average that is in excess of the opacity limit specified in section A.I.2.c.i.

The appropriate records shall be maintained in the permittee's files to identify the persons responsible for conducting the opacity readings and to verify that the Method 9 certifications are up to date for the responsible individuals.

2. The permittee shall monitor the operation of the furnace control systems and maintain records in accordance with the following requirements:
  - a. The permittee shall calibrate and maintain a monitoring device that allows the pressure in the free space inside this emissions unit to be monitored. The monitoring device may be installed in any appropriate location in the EAF ducts prior to the introduction of ambient air such that reproducible results will be obtained. The pressure monitoring device shall have an accuracy of plus or minus 5 mm of water gauge over its normal operating range and shall be calibrated according to the manufacturer's instructions.
  - b. On an hourly basis, the permittee shall check and record the furnace static pressure, and the control system fan motor amperes and damper positions.
  - c. 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). This inspection 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 Ohio EPA, DAPC to approve any alternative to monthly operational status inspections that will provide a continuous record of the operation of each emission capture system.
  - d. Upon approval by the USEPA, an alternative method may be established to replace the monitoring and record keeping requirements found in sections A.III.2.a, A.III.2.b, and A.III.2.c above.

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

3. The permittee shall maintain daily production records for this emissions unit. These records, at a minimum, shall contain the following information:
  - a. the number of hours each emissions unit was in operation;
  - b. the tons of steel produced by each emissions unit; and
  - c. the average hourly production rate for each emissions unit, in tons of steel per hour, determined by dividing section A.III.3.b by section A.III.3.a.
4. The permittee shall maintain monthly records of the tons of steel produced during each calendar month.
5. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly written deviation (excursion) reports of all exceedances of the opacity restrictions contained in section A.I.2.c.i above. For the purposes of these reports, exceedances are defined as all 6-minute periods during which the average opacity exceeds these limits.
2. The permittee shall submit quarterly written deviation (excursion) reports that identify all exceedances of the furnace static pressure value established in section A.II.3, any operation of the control system damper positions outside of the range established in section A.II.4, and fan motor amperes at values other than the values established under section A.II.4.
3. The permittee shall submit quarterly written deviation (excursion) reports that identify any day in which the average hourly production rate of this EAF exceeded 165 tons/hr.
4. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point (i.e., windows, doors, roof monitors, etc.) serving this emissions unit; and
  - b. describe any corrective actions which were taken to eliminate the visible fugitive particulate emissions.
5. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.

### V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

56.8 lbs/hr of particulate emissions for the combined emissions from emissions units P905, P907 and P106

43.17 lbs/hr of PM10 for the combined emissions from emissions units P905, P907 and P106

BACT limit of 0.0032 grain of particulate emissions per dry standard cubic foot of exhaust gases from the no. 4 melt shop baghouse

Applicable Compliance Method:

For particulate emissions - Method 5 of 40 CFR Part 60, Appendix A.

For PM10 - Method 201 of 40 CFR Part 60, Appendix A.

**1.b** Emission Limitation:

3% opacity from the baghouse exit

6% opacity from the melt shop

10% from the dust-handling system

Applicable Compliance Method:

Method 9, 40 CFR Part 60, Appendix A and the procedures of 40 CFR Part 60.11 shall be used to determine opacity as outlined in section A.III.1.

**1.c** Emission Limitation:

11.55 lbs/hr of SO<sub>2</sub>

Applicable Compliance Method:

Multiply the sulfur dioxide emission factor of 0.002 pound SO<sub>2</sub> per ton of steel produced, established during the April 15 & 19, 1999 stack test, by the actual average hourly steel processing rate (tons/hour). If required, a further demonstration of compliance shall be performed using Method 7, 40 CFR Part 60, Appendix A.

**1.d** Emission Limitation:

16.5 lbs/hr of NO<sub>x</sub>

Applicable Compliance Method:

Multiply the nitrogen oxides emission factor of 0.3 pound NO<sub>x</sub> per ton of steel produced, established during the April 15 & 19, 1999 stack test, by the actual average hourly steel processing rate (tons/hour). If required, a further demonstration of compliance shall be performed using Method 7, 40 CFR Part 60, Appendix A.

**1.e** Emission Limitation:

660 lbs/hr of CO

Applicable Compliance Method:

Multiply the carbon monoxide emission factor of 0.8 pound CO per ton of steel produced, established during the April 15 & 19, 1999 stack test, by the actual average hourly steel processing rate (tons/hour). If required, a further demonstration of compliance shall be performed using Method 10, 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

**1.f** Emission Limitation:

57.75 lbs/hr of VOC

Applicable Compliance Method:

Multiply the VOC emission factor of 0.11 pound VOC per ton of steel produced, established during the April 15 & 19, 1999 stack test, by the actual average hourly steel processing rate (tons/hour). If required, a further demonstration of compliance shall be performed using Method 25 or Method 25A, 40 CFR Part 60, Appendix A.

**1.g** Emission Limitation:

0.024 lb/hr of Pb for combined emissions from P905 and P907

Applicable Compliance Method:

Compliance shall be determined by Method 12, 40 CFR Part 60, Appendix A.

**1.h** Emission Limitations:

249 tpy of particulate emissions  
189.24 tpy of PM10  
50.6 tpy of SO<sub>2</sub>  
72.3 tpy of NO<sub>x</sub>  
2,890.8 tpy of CO  
252.9 tpy of VOC  
0.1 tpy of Pb

Applicable Compliance Method:

The tpy limitations were developed by multiplying the lbs/hr limitations by the maximum operating schedule of 8,760 hrs/yr and dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

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

a. The emission testing shall be conducted within 6 months prior to permit expiration for the pollutants listed in section A.V.2.e below.

b. The test(s) shall be conducted while emissions units P106, P905, and P907 are all operating at or near their maximum capacities, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

c. The parametric monitoring requirements established in sections A.II.4 and A.II.5 shall be checked during the emissions test.

d. 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.

## V. Testing Requirements (continued)

e. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

i. for particulates - Method 5 of 40 CFR Part 60, Appendix A;

(a) Method 5D shall be used for positive-pressure fabric filters to determine the particulate matter 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, when a single EAF is sampled, the sampling time shall include an integral number of heats.

(b) If the test results show particulate emissions exceed the PM10 emission limit, then the permittee shall perform a particle size distribution to determine the fraction of the PM10 present in the sample which was collected via Method 5.

ii. for opacity - Method 9 of 40 CFR Part 60, Appendix A and the procedures of 40 CFR Part 60.11 shall be used to determine opacity;

(a) The Method 5 and Method 9 test runs shall be conducted concurrently, unless inclement weather interferes.

iii. for SO<sub>2</sub> - Method 6 of 40 CFR Part 60, Appendix A;

iv. for CO - Method 10 of 40 CFR Part 60, Appendix A;

v. for NO<sub>x</sub> - Method 7 of 40 CFR Part 60, Appendix A;

vi. for VOC - Method 25 of 40 CFR Part 60, Appendix A;

vii. for Pb - Method 12 of 40 CFR Part 60, Appendix A; and

viii. for PM<sub>10</sub> - Method 201 of 40 CFR Part 60, Appendix A.

Alternate test methods may be substituted with prior approval of the CCHD, APCD.

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

Personnel from the CCHD, APCD 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 CCHD, APCD within 30 days following completion of the test(s).

## 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>
165 tons/hr electric arc furnace (EAF no. 9) with direct evacuation control (DEC) and a building evacuation system for capture and a baghouse for control		

**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**

1. An evaluation of air toxic emissions was performed by the permittee. With the exception of aluminum and zinc, emissions of other air toxic pollutants did not exceed one (1) ton per year. The air toxics analyses for Zn showed concentrations of only 1% of the MAGLC and for Al only 3% of the MAGLC. In the event that additional air toxic emissions should exceed one ton per year in the future, the permittee shall perform an evaluation to determine compliance with Ohio EPA's Air Toxics Policy.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** #3 Melt Shop Ladle Dryers/Preheaters (Z001)  
**Activity Description:** Natural gas fired ladle dryer/preheater stands

#### 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>
#3 melt shop ladle dryers/preheaters, three (3) natural gas fired ladle dryer stands each rated at 28 mmBtu/hr (84 mmBtu/hr total)	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.b The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).  
  
At a minimum, the permittee's employment of RACM shall consist of the use of only natural gas as fuel for the preheater.
- 2.c The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel 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 and quantity of fuel burned in 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 the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

1. Compliance with the emissions limitation in section A.1.2.a of these terms and conditions shall be determined in accordance with the following method:

**1.a** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

#### **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:** #4 Melt Shop Ladle Dryers/Preheaters (Z002)  
**Activity Description:** Natural gas fired ladle dryer/preheater stands

#### 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>
#4 melt shop ladle dryers/preheaters, six (6) natural gas fired ladle dryer stands with two stands rated at 12 mmBtu/hr each and four stands rated at 14 mmBtu/hr each	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).  
  
At a minimum, the permittee's employment of RACM shall consist of the use of only natural gas as fuel for the ladle dryers/preheaters.
- The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

##### II. Operational Restrictions

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

##### III. Monitoring and/or Record Keeping Requirements

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

#### **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 the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

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

**1.a** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

#### **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:** AOD Vessel Preheater (Z003)  
**Activity Description:** Natural gas fired AOD vessel preheater

#### 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>
preheater for the AOD vessel, natural gas fired unit rated at 11 mmBtu/hr	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.b The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).  
  
At a minimum, the permittee's employment of RACM shall consist of the use of only natural gas as fuel for the preheater.
- 2.c The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. Natural gas is not part of the process weight rate (PWR) and the PWR does not generate SO<sub>2</sub> emissions; therefore, there is no applicable sulfur dioxide emission limit from OAC rule 3745-18-06(E)(1).

#### II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel 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 and quantity of fuel burned in 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.

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit the required deviation (excursion) reports in accordance with Part I - General Terms and Conditions Section A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

#### **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:** No. 3 Melt Shop Stir Station (Z027)  
**Activity Description:** Argon stir station

#### 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>
#3 melt shop stir station with argon gas and wire feeder controlled by the #3 melt shop baghouse (BGH02)	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)(3)	0.0052 grain of particulate emissions per dry standard cubic foot (gr/dscf) of exhaust gases
	OAC rule 3745-18-06(E)(1)	See A.I.2.c and A.I.2.d below. 1,454 lbs/hr of sulfur dioxide (SO <sub>2</sub> )

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building enclosing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.c The permittee shall minimize or eliminate visible particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall consist of the following:

- i. capture of fugitive particulate emissions using canopy hoods; and
- ii. control of particulate emissions using a baghouse with an outlet emission rate of 0.0052 gr/dscf.

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

- 2.d Emissions units F003, P064, P068, P902, P903, and Z027 shall be vented to the #3 melt shop baghouse. The total allowable outlet emission rate from this baghouse, in accordance with the RACM determination, shall not exceed 0.0052 gr/dscf.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 2 to 9 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established during the emissions testing required in section A.V.2. The appropriate pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 1 month after completion of the emissions testing.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g., windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable ranges specified in section A.II.1, as well as the corrective actions that were taken to achieve compliance.
2. The permittee shall submit deviation reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

20% opacity as a 6-minute average, for stack emissions

Applicable Compliance Method:

Compliance shall be determined 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).

**1.b** Emission Limitation:

20% opacity as a 3-minute average, for fugitives

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.c** Emission Limitation:

1,454 lbs/hr of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Method 6. Based on the FIRE (version 6.22, dated 10/99) emission factor of 0.01 lb SO<sub>2</sub>/ton for electric arc furnaces, actual SO<sub>2</sub> emissions are expected to be much less than the allowable SO<sub>2</sub> emission rate.

**1.d** Emission Limitation:

0.0052 gr/dscf of particulate emissions

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Method 5.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit expiration.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable visible particulate emission limitations, the mass emission rate for particulates, and the mass emission rate for sulfur dioxide.
  - c. The following parameters, at a minimum, shall be monitored and recorded during the emissions testing: the process weight rate, in tons, the sulfur usage, in pounds, and the pressure drop across the baghouse.
  - d. The following test method(s) shall be employed to demonstrate compliance with the allowable emission limitation(s):
    - i. for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A;
    - ii. for the grain loading emission rate for particulate emissions, Method 5 of 40 CFR Part 60, Appendix A; and
    - iii. for the hourly mass emission rate for SO<sub>2</sub>, Method 6 of 40 CFR Part 60, Appendix A.
  - e. 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 CCHD, APCD.

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

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## 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:** No. 4 Melt Shop Bubble Station (Z028)  
**Activity Description:** Argon bubble station

#### 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>
THIS EMISSIONS UNIT HAS BEEN PERMANENTLY SHUTDOWN AND WILL BE REMOVED FROM THE PERMIT RECOMMENDATION UPON RECEIPT OF THE REVISED APPLICATION.	OAC rule 3745-17-07(A)(1)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)	See A.I.2.c below.
	OAC rule 3745-17-11 (Table 1)	72 lbs/hr of particulate emissions
	OAC rule 3745-18-06(E)(1)	1,493 lbs/hr of sulfur dioxide (SO <sub>2</sub> )

##### 2. Additional Terms and Conditions

- Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building enclosing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM).

At a minimum, the permittee's employment of RACM shall include the use of a canopy hood located in the roof of the melt shop (i.e. building evacuation).

The collection efficiency shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 4 to 8 inches of water, while the emissions unit is in operation, until a pressure drop range that is more representative of actual operating conditions can be established. The pressure drop range shall be determined and submitted in writing to the Canton City Health Department, Air Pollution Control Division (CCHD, APCD) within 6 months of permit issuance.

The permittee may petition the CCHD, APCD for reestablishment of the pressure drop range provided the permittee can demonstrate to the CCHD, APCD's satisfaction that the operating conditions upon which the pressure drop range was previously established are no longer applicable.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from any non-stack egress point (e.g. windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive particulate emissions shall be noted in an operations log. If visible fugitive particulate 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 fugitive particulate emission incident; and
  - e. any corrective actions taken to eliminate the visible fugitive particulate emissions.

## IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable ranges specified in section A.II.1, as well as the corrective actions that were taken to achieve compliance.
2. The permittee shall submit semiannual written reports which:
  - a. identify all days during which any visible fugitive particulate emissions were observed from any non-stack egress point serving this emissions unit; and
  - b. describe any corrective actions taken to eliminate the visible fugitive particulate emissions.

These reports shall be submitted by January 31 and July 31 of each year and shall cover the previous 6-month period.

3. The permittee shall submit the deviation reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
4. All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

## V. Testing Requirements (continued)

### 1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be determined 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).

### 1.b Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be determined 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)(3). The points of observation for visible emissions shall include any non-stack egress points from the building enclosing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

### 1.c Emission Limitation:

72 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

### 1.d Emission Limitation:

1,493 lbs/hr of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Method 6. Based on the FIRE (version 6.22, dated 10/99) emission factor of 0.01 lb SO<sub>2</sub>/ton for electric arc furnaces, actual SO<sub>2</sub> emissions are expected to be much less than the allowable SO<sub>2</sub> emission rate.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 6 months prior to permit expiration.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulate matter and sulfur dioxide and the visible particulate emission limitation.
  - c. The following parameters, at a minimum, shall be monitored and recorded during the emissions testing: the process weight rate (in tons); the sulfur usage (in pounds); and the pressure drop across the baghouse.
  - d. The following test method(s) shall be employed to demonstrate compliance with the allowable emissions limitation(s):
    - i. for the visible particulate emissions limitations, Method 9 of 40 CFR Part 60, Appendix A;
    - ii. for the hourly mass emission rate for particulate matter, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and
    - iii. for the hourly mass emission rate for sulfur dioxide, Method 6 of 40 CFR Part 60, Appendix A.
  - e. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or 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 CCHD, APCD. 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 CCHD, APCD's refusal to accept the results of the emission test(s).

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

## 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

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