



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

04/30/01

**CERTIFIED MAIL**

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

06-41-12-0012  
Wheeling-Pittsburgh Steel Corporation - Yorkville Plant  
William V. Polomik  
219 Public Road  
Yorkville, OH 43971-1299

Dear William V. Polomik:

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 Southeast District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

**If you have any questions or comments concerning this draft Title V permit, please contact Southeast District Office.**

Very truly yours,

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

cc: USEPA (electronically submitted)  
Michael Ahern, DAPC PMU  
Southeast District Office  
Pennsylvania  
West Virginia



## Ohio EPA

State of Ohio Environmental Protection Agency

### DRAFT TITLE V PERMIT

Issue Date: 04/30/01

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance to:

Wheeling-Pittsburgh Steel Corporation - Yorkville Plant  
219 Public Road  
Yorkville, OH 43971-1299

of a Title V permit for Facility ID: 06-41-12-0012

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

B011 (Boiler No. 1)

Nebraska Boiler No. 1 (97.2 MMBTU/hr for natural gas and 93.4 MMBTU/hr for fuel oil).

B012 (Boiler No. 2)

Nebraska Boiler No. 2 (97.2 MMBTU/hr for natural gas and 93.4 MMBTU/hr for fuel oil).

F001 (Roadways and Parking Areas)

Paved and unpaved roadways and parking areas within the plant boundaries.

P002 (No. 1 Pickling Line)

Scale removal from hot strip steel by means of heated HCl acid baths (controlled by scrubber).

P010 (Roll Shop Shot Blaster)

Surface preparation of steel work rolls by enclosed cabinet blasting with steel shot (controlled by baghouse).

P011 (Portable Annealing Furnaces)

(33) portable annealing furnaces to relieve strain induced by cold reduction of strip steel. Source given registration status on 2-17-95.

P012 (Continuous Annealing Furnace)

Continuous annealing process to relieve strain induced by cold reduction of strip steel. Source given registration status on 2-17-95.

T002 (HCl Acid Storage Tank (YK-1A))

Regenerated HCl acid storage tank

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:

Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740) 385-8501

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.

## **18. Insignificant Activity**

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

## **B. State Only Enforceable Section**

### **1. Permit to Install Requirement**

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

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

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforcable Section**

**None**

### **B. State Only Enforceable Section**

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

F003 - lime silo;  
P001 - no. 3 tandem mill;  
Z004 - space heaters;  
Z005 - DR mill;  
Z007 - HCl acid storage tank (YK-1);  
Z008 - HCl acid storage tank (YK-2);  
Z009 - HCl acid storage tank (YK-3);  
Z010 - HCl acid storage tank (YK-4);  
Z011 - HCl acid storage tank (YK-6);  
Z012 - HCl acid storage tank (YK-7);  
Z013 - HCl acid storage tank (YK-8);  
Z014 - HCl acid storage tank (YK-16);  
Z015 - no. 2 fuel oil storage tank (YK-17);  
Z016 - no. 2 fuel oil storage tank (YK-18);  
Z017 - diesel fuel oil storage tank (YK-20);  
Z018 - Polar 220-K tank (YK-25);  
Z019 - bearing oil storage tank (YK-31);  
Z020 - bearing oil storage tank (YK-32);  
Z021 - bearing oil storage tank (YK-33); and  
Z022 - bearing oil storage tank (YK-34).

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 No. 1 (B011)

**Activity Description:** Nebraska Boiler No. 1 (97.2 MMBTU/hr for natural gas and 93.4 MMBTU/hr for fuel oil).

#### 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>
Nebraska boiler #1 with a rated capacity of 97.2 mmBtu/hr when burning natural gas and 93.4 mmBtu/hr when burning fuel oil	OAC rule 3745-31-05(A)(3) (PTI 17-500)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input when burning only natural gas or no. 2 fuel oil.
		Particulate emissions shall not exceed 0.16 lb/mmBtu of actual heat input when burning no. 4 fuel oil.
		Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.01 lb/mmBtu of actual heat input when burning only natural gas.
		SO <sub>2</sub> emissions shall not exceed 0.5 lb/mmBtu of actual heat input when burning no. 2 fuel oil or no. 4 fuel oil.
		Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 0.20 lb/mmBtu of actual heat input when burning only natural gas or no. 2 fuel oil.
		NO <sub>x</sub> emissions shall not exceed 0.40 lb/mmBtu of actual heat input when burning no. 4 fuel oil.
		Carbon monoxide (CO) emissions shall not exceed 0.06 lb/mmBtu of actual heat input when burning natural gas, no. 2 fuel oil, or no. 4 fuel oil.
		Lead (Pb) emissions shall not exceed 0.27 lb/hr.

**Operations, Property,  
and/or Equipment**

**Applicable Rules/  
Requirements**

See A.I.2.a below.  
**Applicable Emissions  
Limitations/Control  
Measures**  
 Visible particulate matter 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)	See A.I.2.b below.
OAC rule 3745-18-47(B)	See A.I.2.b below.
OAC rule 3745-71-05	See A.I.2.b below.
OAC rule 3745-21-08(B)	See A.I.2.c below.
OAC rule 3745-23-06(B)	See A.I.2.c below.

**2. Additional Terms and Conditions**

**2.a** No more than a total of 250,000 gallons of no. 4 fuel oil shall be burned in emissions units B011 and B012, combined, per month. This fuel oil shall meet the following limitations:

Contaminant/Property	Allowable level
arsenic	5.0 ppm, maximum
cadmium	2.0 ppm, maximum
chromium	5.0 ppm, maximum
lead	50.0 ppm, maximum
PCB	50.0 ppm, maximum
total halogens	1000.0 ppm, maximum
mercury	1.0 ppm, maximum
flash point	100 degrees F, minimum
heat content	135,000 Btu/gallon, minimum

**2.b** The emission limitation required by this applicable rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2.c** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 17-500.

**II. Operational Restrictions**

1. The quality of fuel oil burned in this emissions unit shall meet, on an as-received basis, a sulfur content that will allow compliance with the maximum SO<sub>2</sub> emission limitation of 0.5 pound of SO<sub>2</sub> per mmBtu of actual heat input. Compliance shall be demonstrated using the analytical results provided by the permittee or oil supplier for each shipment of oil.
2. The actual operating rate for this emissions unit shall not exceed 97.2 mmBtu/hr when burning only natural gas and 93.4 mmBtu/hr when burning fuel oil.

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

1. The permittee shall maintain records of the fuel oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

- a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate (in lbs/mmBtu). (The SO<sub>2</sub> emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. Also, if necessary, the permittee shall maintain monthly records of the calculated SO<sub>2</sub> emission rate based upon a volume-weighted average of the calculated SO<sub>2</sub> emission rates for all shipments of oil during a calendar month.

- b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day (except for the purpose of test-firing), the permittee's analyses for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate (in lbs/mmBtu).

(The SO<sub>2</sub> emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) Also, if necessary, the permittee shall maintain monthly records of the calculated SO<sub>2</sub> emission rate based upon a volume-weighted average of the calculated SO<sub>2</sub> emission rates for all of the daily samples during a calendar month.

2. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.
3. The permittee shall maintain monthly records of the quantity of no. 4 fuel oil burned in this emissions unit and emissions units B011 and B012, combined.
4. Each oil analysis shall be kept for a minimum of 5 years and shall be made available to any representative of Ohio EPA upon written or verbal request.
5. The permittee shall perform daily checks, when the emissions unit is in operation and burning no. 2 or no. 4 fuel oil, and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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

6. Each shipment of no. 4 fuel oil shall be accompanied by a chemical analysis from the supplier. This analysis shall include, as a minimum, the following information:
- a. the name and address of the supplier;
  - b. the supplier's U.S. EPA identification number;
  - c. the date of shipment and delivery;
  - d. the quantity of oil received;
  - e. the Btu value;
  - f. the flash point;
  - g. the arsenic content;
  - h. the cadmium content;
  - i. the chromium content;
  - j. the lead content;
  - k. the PCB content;
  - l. the total halogen content; and
  - m. the mercury content.

The analysis for each shipment of no. 4 fuel oil shall be performed in accordance with the following procedures. Alternate procedures may be used with consent from Ohio EPA:

Parameter	Sample Extraction	Sample Analysis
Total halogens		ASTM D808-81
Arsenic	SW-846 3040 or 3050*	SW-846 7060
Cadmium	SW-846 3040 or 3050*	SW-846 6010 or 7131
Chromium	SW-846 3040 or 3050*	SW-846 6010 or 7191
Lead	SW-846 3040 or 3050*	SW-846 6010, 7420 or 7421
PCB		SW-846 8080
Mercury	SW-846 3040 or 3050*	SW-846 7470
Flash point		SW-846 1010
Heat content		ASTM D 40-64(73)

\* SW-846 3050 is used for extracting metals from sedimentaceous oils.

7. Any Ohio EPA representative shall be permitted to obtain a sample of any shipment of no. 4 fuel oil, any no. 4 fuel oil storage tank, or any process employing no. 4 fuel oil for the purpose of conducting chemical analyses for compliance determination purposes.

**IV. Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA, Southeast District Office) in writing of any record which shows a deviation of the allowable SO<sub>2</sub> emission limitation based upon a volume-weighted average of the calculated SO<sub>2</sub> emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office within 45 days after the deviation occurs.

#### IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports to the Ohio EPA, Southeast District Office providing the following information:
  - a. the total quantity of no. 4 fuel oil burned in emissions units B011 and B012 for each calendar month during the quarter;
  - b. a copy of the results of the chemical analysis required for each shipment of no. 4 fuel oil received during the calendar quarter; and
  - c. a calculation of the total lead emissions for the quarter.

In order to determine quarterly lead emissions, the permittee shall utilize the following equation where CPb is the lead concentration, in ppm:

$$[(CPb)/1 \text{ million lbs of oil}] \times (7.88 \text{ lb of oil/gallon}) \times (\text{gallons of oil used in quarter}) = \text{lb of Pb emissions for quarter reported.}$$

3. 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 particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### 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 Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:

0.020 pound of particulate emissions per mmBtu when firing only natural gas and no. 2 fuel oil  
0.16 pound of particulate emissions per mmBtu when firing no. 4 fuel oil

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulates may be determined by dividing an emission factor of 2.0 pounds of particulate per 1000 gallons of no. 2 fuel oil, 7.0 pounds of particulate per 1000 gallons of no. 4 fuel oil, or 1.9 pounds of particulate per million cubic feet of natural gas combusted by the heat content of the oil or gas (mmBtu/1000 gallons of oil or mmBtu/million cubic feet of gas) as determined through the fuel analyses required in section A.III.1 above. Natural gas calculations shall use 1000 mmBtu/million cubic feet. These emission factors are specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (for fuel oil) or Section 1.4, Table 1.4-2 (for natural gas).

If required, the permittee shall demonstrate compliance with these emission limitations in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(9).

## V. Testing Requirements (continued)

### 1.c Emission Limitation:

0.01 pound of SO<sub>2</sub> per mmBtu when firing only natural gas  
0.5 pound of SO<sub>2</sub> per mmBtu when firing no. 2 and no. 4 fuel oil

Applicable Compliance Method:

When firing no. 2 or no. 4 fuel oil, compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

When firing natural gas, compliance may be based upon the following calculation:

$$(0.6 \text{ lb of SO}_2/\text{mmscf}) \times (1 \text{ mmscf}/1000 \text{ mmBtu}) = 0.0006 \text{ lb of SO}_2/\text{mmBtu}$$

The SO<sub>2</sub> emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.4-2. The factor of 1000 mmBtu/mmscf was assumed.

If required, compliance with the SO<sub>2</sub> emission limitations shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6 and OAC rule 3745-18-04(E), while firing the appropriate fuel.

### 1.d Emission Limitation:

0.06 pound of CO per mmBtu when burning natural gas, no. 2 fuel oil, or no. 4 fuel oil

Applicable Compliance Method:

Compliance may be demonstrated based upon the following calculations:

When burning only natural gas:

$$(35 \text{ lb of CO}/\text{mmcf}) \times (1 \text{ mmcf}/1000 \text{ mmBtu}) = 0.035 \text{ lb of CO}/\text{mmBtu}$$

The CO emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.4-1. The factor of 1000 mmBtu/mmscf was assumed.

When burning no. 2 or no. 4 fuel oil:

$$(5 \text{ lb of CO}/1000 \text{ gallons}) \times (1 \text{ gallon}/145,000 \text{ Btu}) \times (1,000,000 \text{ Btu}/\text{mmBtu}) = 0.034 \text{ lb of CO}/\text{mmBtu}$$

The CO emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.3-1. The factor of 145,000 Btu/gallon was assumed.

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 10.

## V. Testing Requirements (continued)

### 1.e Emission Limitation:

0.27 lb/hr of lead when burning natural gas, no. 2 fuel oil, and no. 4 fuel oil

Applicable Compliance Method:

Compliance with the above lead emission limitation shall be demonstrated based upon the information gathered through each chemical analysis described in section A.V.2. The permittee shall not utilize any fuel that does not meet the restrictions specified in section A.I.2.b.

The following equation may be used to determine compliance, where CPb = lead concentration, in ppm:

$$(CPb) \times (93.4 \text{ mmBtu/hr}) \times (1,000,000 \text{ gallons of oil}/135,000 \text{ mmBtu}) \times (7.88 \text{ lb of oil/gallon}) = \text{lb/hr of Pb}$$

If required, compliance with the lead emission limitation shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 12 and OAC rule 3745-71-05.

### 1.f Emission Limitation:

0.20 lb of NOx/mmBtu when burning only natural gas or no. 2 fuel oil

0.40 lb of NOx/mmBtu when burning no. 4 fuel oil

Applicable Compliance Method:

Compliance may be demonstrated based upon the following equation when burning only natural gas:

$$(140 \text{ lbs of NOx/mmcf}) \times (1 \text{ mmcf}/1000 \text{ mmBtu}) = 0.14 \text{ lb of NOx/mmBtu}$$

The NOx emission factor was obtained from AP-42, 5th edition, Chapter 1, Table 1.4-1, dated July, 1998. The factor of 1000 Btu/cf was assumed.

Compliance may be demonstrated based upon the following equation when burning no. 2 fuel oil or no. 4 fuel oil:

$$(20 \text{ lbs of NOx}/1000 \text{ gallons}) \times (1 \text{ gallon}/145,000 \text{ Btu}) \times (1,000,000 \text{ Btu}/\text{mmBtu}) = 0.14 \text{ lb of NOx}/\text{mmBtu}$$

The NOx emission factor was obtained from AP-42, 5th edition, Chapter 1, Table 1.3-1, dated July, 1998. The factor of 1 gallon/145,000 Btu was assumed.

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 7 and OAC rule 3745-14-05.

## 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 No. 2 (B012)

**Activity Description:** Nebraska Boiler No. 2 (97.2 MMBTU/hr for natural gas and 93.4 MMBTU/hr for fuel oil).

#### 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>
Nebraska boiler #2 with a rated capacity of 97.2 mmBtu/hr when burning natural gas and 93.4 mmBtu/hr when burning fuel oil	OAC rule 3745-31-05(A)(3) (PTI 17-500)	<p>Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input when burning only natural gas or no. 2 fuel oil.</p> <p>Particulate emissions shall not exceed 0.16 lb/mmBtu of actual heat input when burning no. 4 fuel oil.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.01 lb/mmBtu of actual heat input when burning only natural gas.</p> <p>SO<sub>2</sub> emissions shall not exceed 0.5 lb/mmBtu of actual heat input when burning no. 2 fuel oil or no. 4 fuel oil.</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.20 lb/mmBtu of actual heat input when burning only natural gas or no. 2 fuel oil.</p> <p>NO<sub>x</sub> emissions shall not exceed 0.40 lb/mmBtu of actual heat input when burning no. 4 fuel oil.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.06 lb/mmBtu of actual heat input when burning natural gas, no. 2 fuel oil, or no. 4 fuel oil.</p> <p>Lead (Pb) emissions shall not exceed 0.27 lb/hr.</p>

**Operations, Property,  
and/or Equipment**

**Applicable Rules/  
Requirements**

See A.I.2.a below.  
**Applicable Emissions  
Limitations/Control  
Measures**  
 Visible particulate matter 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)	See A.I.2.b below.
OAC rule 3745-18-47(B)	See A.I.2.b below.
OAC rule 3745-71-05	See A.I.2.b below.
OAC rule 3745-21-08(B)	See A.I.2.c below.
OAC rule 3745-23-06(B)	See A.I.2.c below.

**2. Additional Terms and Conditions**

**2.a** No more than a total of 250,000 gallons of no. 4 fuel oil shall be burned in emissions units B011 and B012, combined, per month. This fuel oil shall meet the following limitations:

Contaminant/Property	Allowable level
arsenic	5.0 ppm, maximum
cadmium	2.0 ppm, maximum
chromium	5.0 ppm, maximum
lead	50.0 ppm, maximum
PCB	50.0 ppm, maximum
total halogens	1000.0 ppm, maximum
mercury	1.0 ppm, maximum
flash point	100 degrees F, minimum
heat content	135,000 Btu/gallon, minimum

**2.b** The emission limitation required by this applicable rule is equal to or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2.c** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install 17-500.

**II. Operational Restrictions**

1. The quality of fuel oil burned in this emissions unit shall meet, on an as-received basis, a sulfur content that will allow compliance with the maximum SO<sub>2</sub> emission limitation of 0.5 pound of SO<sub>2</sub> per mmBtu of actual heat input. Compliance shall be demonstrated using the analytical results provided by the permittee or oil supplier for each shipment of oil.
2. The actual operating rate for this emissions unit shall not exceed 97.2 mmBtu/hr when burning only natural gas and 93.4 mmBtu/hr when burning fuel oil.

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

1. The permittee shall maintain records of the fuel oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

- a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate (in lbs/mmBtu). (The SO<sub>2</sub> emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. Also, if necessary, the permittee shall maintain monthly records of the calculated SO<sub>2</sub> emission rate based upon a volume-weighted average of the calculated SO<sub>2</sub> emission rates for all shipments of oil during a calendar month.

- b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day (except for the purpose of test-firing), the permittee's analyses for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate (in lbs/mmBtu).

(The SO<sub>2</sub> emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) Also, if necessary, the permittee shall maintain monthly records of the calculated SO<sub>2</sub> emission rate based upon a volume-weighted average of the calculated SO<sub>2</sub> emission rates for all of the daily samples during a calendar month.

2. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240, D4294, D6010), or equivalent methods as approved by the Director.
3. The permittee shall maintain monthly records of the quantity of no. 4 fuel oil burned in this emissions unit and emissions units B011 and B012, combined.
4. Each oil analysis shall be kept for a minimum of 5 years and shall be made available to any representative of Ohio EPA upon written or verbal request.
5. The permittee shall perform daily checks, when the emissions unit is in operation and burning no. 2 or no. 4 fuel oil, and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

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

6. Each shipment of no. 4 fuel oil shall be accompanied by a chemical analysis from the supplier. This analysis shall include, as a minimum, the following information:
- a. the name and address of the supplier;
  - b. the supplier's U.S. EPA identification number;
  - c. the date of shipment and delivery;
  - d. the quantity of oil received;
  - e. the Btu value;
  - f. the flash point;
  - g. the arsenic content;
  - h. the cadmium content;
  - i. the chromium content;
  - j. the lead content;
  - k. the PCB content;
  - l. the total halogen content; and
  - m. the mercury content.

The analysis for each shipment of no. 4 fuel oil shall be performed in accordance with the following procedures. Alternate procedures may be used with consent from Ohio EPA:

Parameter	Sample Extraction	Sample Analysis
Total halogens		ASTM D808-81
Arsenic	SW-846 3040 or 3050*	SW-846 7060
Cadmium	SW-846 3040 or 3050*	SW-846 6010 or 7131
Chromium	SW-846 3040 or 3050*	SW-846 6010 or 7191
Lead	SW-846 3040 or 3050*	SW-846 6010, 7420 or 7421
PCB		SW-846 8080
Mercury	SW-846 3040 or 3050*	SW-846 7470
Flash point		SW-846 1010
Heat content		ASTM D 40-64(73)

\* SW-846 3050 is used for extracting metals from sedimentaceous oils.

7. Any Ohio EPA representative shall be permitted to obtain a sample of any shipment of no. 4 fuel oil, any no. 4 fuel oil storage tank, or any process employing no. 4 fuel oil for the purpose of conducting chemical analyses for compliance determination purposes.

**IV. Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA, Southeast District Office) in writing of any record which shows a deviation of the allowable SO<sub>2</sub> emission limitation based upon a volume-weighted average of the calculated SO<sub>2</sub> emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office within 45 days after the deviation occurs.

#### IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly reports to the Ohio EPA, Southeast District Office providing the following information:
  - a. the total quantity of no. 4 fuel oil burned in emissions units B011 and B012 for each calendar month during the quarter;
  - b. a copy of the results of the chemical analysis required for each shipment of no. 4 fuel oil received during the calendar quarter; and
  - c. a calculation of the total lead emissions for the quarter.

In order to determine quarterly lead emissions, the permittee shall utilize the following equation where CPb is the lead concentration, in ppm:

$$[(CPb)/1 \text{ million lbs of oil}] \times (7.88 \text{ lb of oil/gallon}) \times (\text{gallons of oil used in quarter}) = \text{lb of Pb emissions for quarter reported.}$$

3. 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 particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### 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 Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:

0.020 pound of particulate emissions per mmBtu when firing only natural gas and no. 2 fuel oil  
0.16 pound of particulate emissions per mmBtu when firing no. 4 fuel oil

Applicable Compliance Method:

Compliance with the allowable mass emission rate for particulates may be determined by dividing an emission factor of 2.0 pounds of particulate per 1000 gallons of no. 2 fuel oil, 7.0 pounds of particulate per 1000 gallons of no. 4 fuel oil, or 1.9 pounds of particulate per million cubic feet of natural gas combusted by the heat content of the oil or gas (mmBtu/1000 gallons of oil or mmBtu/million cubic feet of gas) as determined through the fuel analyses required in section A.III.1 above. Natural gas calculations shall use 1000 mmBtu/million cubic feet. These emission factors are specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (for fuel oil) or Section 1.4, Table 1.4-2 (for natural gas).

If required, the permittee shall demonstrate compliance with these emission limitations in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(9).

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

0.01 pound of SO<sub>2</sub> per mmBtu when firing only natural gas  
0.5 pound of SO<sub>2</sub> per mmBtu when firing no. 2 and no. 4 fuel oil

Applicable Compliance Method:

When firing no. 2 or no. 4 fuel oil, compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.

When firing natural gas, compliance may be based upon the following calculation:

$$(0.6 \text{ lb of SO}_2/\text{mmscf}) \times (1 \text{ mmscf}/1000 \text{ mmBtu}) = 0.0006 \text{ lb of SO}_2/\text{mmBtu}$$

The SO<sub>2</sub> emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.4-2. The factor of 1000 mmBtu/mmscf was assumed.

If required, compliance with the SO<sub>2</sub> emission limitations shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6 and OAC rule 3745-18-04(E), while firing the appropriate fuel.

**1.d** Emission Limitation:

0.06 pound of CO per mmBtu when burning natural gas, no. 2 fuel oil, or no. 4 fuel oil

Applicable Compliance Method:

Compliance may be demonstrated based upon the following calculations:

When burning only natural gas:

$$(35 \text{ lb of CO}/\text{mmcf}) \times (1 \text{ mmcf}/1000 \text{ mmBtu}) = 0.035 \text{ lb of CO}/\text{mmBtu}$$

The CO emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.4-1. The factor of 1000 mmBtu/mmscf was assumed.

When burning no. 2 or no. 4 fuel oil:

$$(5 \text{ lb of CO}/1000 \text{ gallons}) \times (1 \text{ gallon}/145,000 \text{ Btu}) \times (1,000,000 \text{ Btu}/\text{mmBtu}) = 0.034 \text{ lb of CO}/\text{mmBtu}$$

The CO emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.3-1. The factor of 145,000 Btu/gallon was assumed.

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 10.

## V. Testing Requirements (continued)

### 1.e Emission Limitation:

0.27 lb/hr of lead when burning natural gas, no. 2 fuel oil, and no. 4 fuel oil

Applicable Compliance Method:

Compliance with the above lead emission limitation shall be demonstrated based upon the information gathered through each chemical analysis described in section A.V.2. The permittee shall not utilize any fuel that does not meet the restrictions specified in section A.I.2.b.

The following equation may be used to determine compliance, where CPb = lead concentration, in ppm:

$$(CPb) \times (93.4 \text{ mmBtu/hr}) \times (1,000,000 \text{ gallons of oil}/135,000 \text{ mmBtu}) \times (7.88 \text{ lb of oil/gallon}) = \text{lb/hr of Pb}$$

If required, compliance with the lead emission limitation shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 12 and OAC rule 3745-71-05.

### 1.f Emission Limitation:

0.20 lb of NOx/mmBtu when burning only natural gas or no. 2 fuel oil

0.40 lb of NOx/mmBtu when burning no. 4 fuel oil

Applicable Compliance Method:

Compliance may be demonstrated based upon the following equation when burning only natural gas:

$$(140 \text{ lbs of NOx/mmcf}) \times (1 \text{ mmcf}/1000 \text{ mmBtu}) = 0.14 \text{ lb of NOx/mmBtu}$$

The NOx emission factor was obtained from AP-42, 5th edition, Chapter 1, Table 1.4-1, dated July, 1998. The factor of 1000 Btu/cf was assumed.

Compliance may be demonstrated based upon the following equation when burning no. 2 fuel oil or no. 4 fuel oil:

$$(20 \text{ lbs of NOx}/1000 \text{ gallons}) \times (1 \text{ gallon}/145,000 \text{ Btu}) \times (1,000,000 \text{ Btu}/\text{mmBtu}) = 0.14 \text{ lb of NOx/mmBtu}$$

The NOx emission factor was obtained from AP-42, 5th edition, Chapter 1, Table 1.3-1, dated July, 1998. The factor of 1 gallon/145,000 Btu was assumed.

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 7 and OAC rule 3745-14-05.

## 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:** Paved and unpaved roadways and parking areas within the plant boundaries.

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paved roadways and parking areas (see section A.I.2.a)	OAC rule 3745-17-07(B)(4)	no visible particulate emissions except for 6 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(8), (B)(9)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.c, A.I.2.d, and A.I.2.f through A.I.2.k)
unpaved roadways and parking areas (see section A.I.2.b)	OAC rule 3745-17-07(B)(5)	no visible particulate emissions except for 13 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(2)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.e through A.I.2.k)

##### 2. Additional Terms and Conditions

- 2.a The following paved roadways and parking areas located at the Wheeling-Pittsburgh Steel Yorkville facility are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08:
  - i. paved parking area #1;
  - ii. main gate paved roads;
  - iii. east gate paved roads; and
  - iv. north paved roads.
- 2.b The following unpaved roadways and parking areas located at the Wheeling-Pittsburgh Steel Yorkville facility are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08:
  - i. unpaved WWT road; and
  - ii. north unpaved road.

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

- 2.c** The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by employing a self-propelled vacuum sweeper at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with chemical stabilization at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with chemical stabilization at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.f** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. 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 ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.g** 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 controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.h** 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.i** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.j** The permittee shall post and enforce a speed limitation of 10 miles per hour on all roads and parking areas located at the Yorkville facility.
- 2.k** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

## **II. Operational Restrictions**

**None**



**IV. Reporting Requirements (continued)**

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitation for the paved and unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

**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. 1 Pickling Line (P002)

**Activity Description:** Scale removal from hot strip steel by means of heated HCl acid baths (controlled by scrubber).

#### 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.1 pickling line and scrubber system	40 CFR Part 63, Subpart CCC	<p>No exhaust gases from the scrubber stack shall contain hydrochloric acid (HCl) in a concentration in excess of 18 parts per million by volume (ppmv).</p> <p>or</p> <p>HCl shall not be emitted at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.</p> <p>See A.I.2 below.</p>

##### 2. Additional Terms and Conditions

2. The permittee shall achieve initial compliance with the requirements of this Subpart no later than June 22, 2001.

##### II. Operational Restrictions

1. The permittee shall comply with the operation and maintenance requirements specified in 40 CFR 63.6(e).
- 1.a 40 CFR 63.6(e) requires the permittee of an affected emissions unit to operate and maintain each affected emissions unit, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all times, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.

## II. Operational Restrictions (continued)

2. The permittee shall prepare an operation and maintenance plan for each emission control device, to be implemented no later than June 22, 2001. The operation and maintenance plan shall be consistent with good maintenance practices and shall include all the requirements specified in 40 CFR 63.1160(b)(2), sections A.II.2.a and A.II.2.b as listed below, and sections A.III.8, A.III.9, A.III.10, and A.III.11:
  - a. the permittee shall follow the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans; and
  - b. the scrubber internals and mist eliminators shall be cleaned at intervals sufficient to prevent buildup of solids or other fouling.
3. The scrubber makeup water flow rate shall be continuously maintained at a value greater than or equal to the value recommended by the scrubber manufacturer until such time as an initial compliance test is performed. After the initial compliance test is completed, the scrubber makeup water flow rate shall be continuously maintained at a value greater than or equal to the minimum makeup water flow rate established during the most recent emission test that demonstrated that the emissions unit was in compliance.

The scrubber recirculation water flow rate shall be continuously maintained at a value greater than or equal to the value recommended by the scrubber manufacturer until such time as an initial compliance test is performed. After the initial compliance test is completed, the scrubber recirculation water flow rate shall be continuously maintained at a value greater than or equal to the minimum recirculation water flow rate established during the most recent emission test that demonstrated that the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall install, operate, and maintain systems for the measurement and recording of the scrubber makeup water flow rate and recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in 40 CFR 63.1160(b)(2).
2. Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions, but not less frequently than once per year.
3. The permittee may develop and implement alternative monitoring requirements subject to approval by the Administrator and the Ohio EPA, Southeast District Office.

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

4. The permittee shall maintain records for 5 years from the date of each record of:
  - a. the occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., for process equipment);
  - b. the occurrence and duration of each malfunction of the air pollution control equipment;
  - c. all maintenance performed on the air pollution control equipment;
  - d. actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
  - e. all information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan (this information can be recorded in a checklist or similar form);
  - f. all required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;
  - g. all results of initial or subsequent performance tests;
  - h. if the permittee has been granted a waiver from record keeping or reporting requirements under 40 CFR 63.10(f), any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements;
  - i. if the permittee has been granted a waiver from the initial performance test under 40 CFR 63.7(h), a copy of the full request and the Administrator's approval or disapproval;
  - j. all documentation supporting initial notifications and notifications of compliance status required by 40 CFR 63.9; and
  - k. records of any applicability determination, including supporting analyses.
5. The permittee shall maintain records for 5 years from the date of each record of:
  - a. scrubber makeup water flow rate data and recirculation water flow rate data;
  - b. calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and
  - c. each maintenance inspection and repair, replacement, or other corrective action.
6. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator and the Ohio EPA, Southeast District Office for the life of the affected source or until the source is no longer subject to the provisions of the Subpart. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Administrator and the Ohio EPA, Southeast District Office for a period of 5 years after each revision to the plan.
7. General records and 40 CFR Part 63, Subpart CCC records for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.
8. The permittee shall monitor and record the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance.

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

9. Inspection of each scrubber shall be conducted at intervals of no less than 3 months and shall include the following:
- i. cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
  - ii. repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
  - iii. repair or replacement of droplet eliminator elements as needed;
  - iv. repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
  - v. adjustment of damper settings for consistency with the required air flow.

If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Administrator and the Ohio EPA, Southeast District Office may be used.

10. The permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of 40 CFR Part 63, Subpart CCC.
11. The permittee shall maintain a record of each inspection, including each item identified in section A.I.2.f, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

### IV. Reporting Requirements

1. The permittee shall submit deviation reports for any of the following occurrences:
- a. the identification of any excursion of the scrubber makeup water and recirculation water flow rates required in section A.III.1; and
  - b. the identification of any malfunction of the control or process equipment required in sections A.III.4.a and/or A.III.4.b and the information required in sections A.III.4.c, A.III.4.d, A.III.4.e, and A.III.5.c.

The permittee shall also identify in these reports any scrubber pressure drop readings that indicate a need for maintenance as required in section A.III.8.

2. All reports shall be submitted within 7 days of the occurrence of any malfunction or deviation (excursion) and shall include the following information in addition to the information required in section A.IV.1:
- a. the date and time of the excursion/malfunction;
  - b. the description of the excursion/malfunction;
  - c. the cause of the malfunction/excursion;
  - d. the length of time that the malfunction occurred;
  - e. the immediate corrective actions taken;
  - f. the date and time that corrective actions were implemented;
  - g. the description of the corrective actions taken; and
  - h. the name of the individual responsible for implementing corrective actions.
3. As required by 40 CFR 63.10(d)(2), the permittee of an affected emissions unit shall report the results of any performance test as part of the notification of compliance status required in 40 CFR 63.1163.
4. If actions taken by the permittee during a startup, shutdown, or malfunction of an affected emissions unit (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the permittee or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.

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

5. Any time an action taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of 40 CFR 63.10(d)(5)(ii).

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

1. The permittee shall conduct an initial performance test for each process or emission control device to determine and demonstrate compliance with the applicable emission limitation according to the requirements specified in 40 CFR 63.7.

Performance tests shall be conducted to measure the HCl mass emission rates at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in 40 CFR 63.1161. Performance tests shall be conducted either annually or according to an alternative schedule that is approved by the applicable permitting authority, but no less frequently than every 2.5 years or twice per Title V permit term.

2. Following approval of the site-specific test plan, the permittee shall conduct a performance test for each process or control device to either measure simultaneously the mass emission rates of HCl at the inlet and the outlet of the control device (to determine compliance with the applicable collection efficiency standard) or measure the concentration of HCl in gases exiting the process or the emission control device (to determine compliance with the applicable emission concentration standard).
3. Compliance with the applicable concentration standard or collection efficiency standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.
4. Compliance is achieved if either the average collection efficiency as determined by the HCl mass emission rates at the control device inlet and outlet is greater than or equal to the applicable collection efficiency standard, or the average measured concentration of HCl exiting the process or the emission control device is less than or equal to the applicable emission concentration standard.
5. During the performance test for each emission control device, the permittee using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation, the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The permittee shall determine the operating parameter monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per section A.V.3, above. The permittee may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, the permittee may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

## V. Testing Requirements (continued)

6. The following test methods in 40 CFR Part 60, Appendix A shall be used to determine compliance under 40 CFR 63.1157(a), 63.1157(b), 63.1158(a), and 63.1158(b):
  - a. Method 1, to determine the number and location of sampling points, with the exception that no traverse point shall be within one inch of the stack or duct wall;
  - b. Method 2, to determine gas velocity and volumetric flow rate;
  - c. Method 3, to determine the molecular weight of the stack gas;
  - d. Method 4, to determine the moisture content of the stack gas; and
  - e. Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources--Isokinetic Method," to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (30 dry standard cubic feet). The concentrations of HCl shall be calculated for each run as follows:

$$C(\text{ppmv}) = 0.659 C(\text{mg/dscm}),$$

where:

C(ppmv) is concentration in ppmv and C(mg/dscm) is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.

7. The permittee may use equivalent alternative measurement methods approved by the Administrator and the Ohio EPA, Southeast District Office.
8. The permittee of an affected emissions unit shall notify the Administrator and the Ohio EPA, Southeast District Office in writing of the intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow the Administrator and the Ohio EPA, Southeast District Office to review and approve the site-specific test plan required in 40 CFR 63.7(c) and, if requested by the Administrator and/or the Ohio EPA, Southeast District Office, to have an observer present during the test.

## 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:** Roll Shop Shot Blaster (P010)

**Activity Description:** Surface preparation of steel work rolls by enclosed cabinet blasting with steel shot (controlled by baghouse).

#### 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>
Pangborn shotblaster model 25 M vented through baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	8.07 lbs/hr of particulate emissions

##### 2. Additional Terms and Conditions

- 2.a The permittee shall not operate this emissions unit unless the dust collection system is in operation.

##### II. Operational Restrictions

None

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

1. The permittee shall inspect the following items associated with the shot blaster pollution control equipment on a once-per-day basis on all days that the shot blaster is in operation:
  - a. all air pollution control ductwork located on the outside of the building for leaks, holes, or other damage;
  - b. all joints and fittings located outside of the building for leaks or improper sealing; and
  - c. the baghouse unit for leaks and any visible particulate emissions.
2. The permittee shall collect the following data for each day that the shot blaster is in operation:
  - a. the date and time of the inspection;
  - b. the name of the person conducting the daily inspection;
  - c. the notation of any problems and visible particulate emissions observed per section A.III.1 (if no problems or visible particulate emissions were observed, a note shall be made stating this);
  - d. the description of measures taken to correct any problems; and
  - e. the date that the problem was corrected.

#### **IV. Reporting Requirements**

1. The permittee shall submit a report for each day during which any problems or visible particulate emissions were recorded per sections A.III.2.c, A.III.2.d, and A.III.2.e. Reports shall include all information recorded, including observations and actions taken to correct the problem(s) and shall be submitted within 30 days of the excursion.

#### **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 Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:

8.07 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance may be demonstrated based upon the following calculation:

$(0.69 \text{ lb of particulates}/1000 \text{ lbs of abrasive}) \times (\text{lbs of abrasive}/\text{hr}) = \text{lbs of particulate emissions}/\text{hr}$

The particulate emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 13, Table 13.2.6-1, September, 1997.

If required, emission testing shall be performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

#### **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:** Portable Annealing Furnaces (P011)

**Activity Description:** (33) portable annealing furnaces to relieve strain induced by cold reduction of strip steel. Source given registration status on 2-17-95.

#### 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>
portable annealing furnaces (33)	OAC rule 3745-17-07(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)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.

##### 2. Additional Terms and Conditions

None

##### 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 quarterly 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.

##### V. Testing Requirements

- Compliance with the emission 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:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

**1.b** Emission Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance may be demonstrated based upon the following calculation:

$$(1.9 \text{ lb of particulates/mmscf}) \times (1 \text{ mmscf}/1000 \text{ mmBtu}) = 0.019 \text{ lb of particulates/mmBtu}$$

The particulate emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.4-2. The factor of 1000 mmBtu/mmscf was assumed.

If required, emission testing shall be performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

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

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** Continuous Annealing Furnace (P012)

**Activity Description:** Continuous annealing process to relieve strain induced by cold reduction of strip steel. Source given registration status on 2-17-95.

#### 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>
continuous annealing furnace	OAC rule 3745-17-07(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)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.

##### 2. Additional Terms and Conditions

None

##### 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 quarterly 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.

##### V. Testing Requirements

- Compliance with the emission 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:

Compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

**1.b** Emission Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance may be demonstrated based upon the following calculation:

$$(1.9 \text{ lb of particulates/mmscf}) \times (1 \text{ mmscf}/1000 \text{ mmBtu}) = 0.019 \text{ lb of particulates/mmBtu}$$

The particulate emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.4-2. The factor of 1000 mmBtu/mmscf is assumed.

If required, emission testing shall be performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

**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:** HCl Acid Storage Tank (YK-1A) (T002)

**Activity Description:** Regenerated HCl acid storage tank

#### 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>
20,000-gallon regenerated hydrochloric acid storage tank	40 CFR Part 63, Subpart CCC	See A.I.2.a below.

##### 2. Additional Terms and Conditions

- 2.a The permittee shall provide and operate, except during loading and unloading of acid, a closed-vent system for each vessel. Loading and unloading shall be conducted either through enclosed lines or each point where the acid is exposed to the atmosphere shall be equipped with a local fume capture system, ventilated through an air pollution control device.

##### II. Operational Restrictions

None

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

1. The permittee shall inspect each vessel semiannually to determine that the closed-vent system and either the air pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.

##### IV. Reporting Requirements

1. The permittee shall submit a detailed deviation (excursion) report documenting each time that acid is loaded or unloaded without the use of the required enclosed lines or fume capture system and air pollution control device. These reports shall be submitted within 30 days of the deviation.
2. The permittee shall submit a detailed deviation (excursion) report documenting any malfunction of the closed vent system required by 40 CFR Part 63, Subpart CCC. These reports shall be submitted within 30 days of the deviation.

##### 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

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