State of Ohio Environmental Protection Agency

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

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

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

11/30/99

**CERTIFIED MAIL**

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

02-50-11-0886
Youngstown Sinter Company
Thomas O. Shepker
1040 Pine Avenue, S.E.
Warren, OH 44483-6528

Dear Thomas O. Shepker:

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 Northeast 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 Northeast District Office.**

Very truly yours,

Thomas G. Rigo

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

cc: USEPA (electronic)
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Northeast District Office
Pennsylvania
West Virginia

**Ohio EPA**
State of Ohio Environmental Protection Agency

# DRAFT TITLE V PERMIT

Issue Date: 11/30/99

Effective Date:

Expiration Date:

*The duration of this permit will be five years.*

This document constitutes issuance to:

Youngstown Sinter Company
251 Division Street
Youngstown, OH 44510-0010

of a Title V permit for Facility ID: 02-50-11-0886

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
F001 (Roads and Parking Areas)
Paved and unpaved roadways and parking areas.

F002 (Raw Material and Product Storage Piles)
Sintering raw feed materials and product storage piles in Ore Yard.

F003 (Sinter Cooler Discharge End)
Finished sinter discharge from cooler with pick-up points vented to cooler baghouse.

F004 (Raw Material Unloading, Transfer, Conveying & Storage)
Raw materials handling including: unloading, screening, conveying, transfers and surge bins.

F005 (Hi-Line Truck Load-out Station)
Finished sinter handling (70%) at high line load-out station served by dedicated section of 'Cooler' baghouse.

F006 (Truck Load-out (Ore Yard))
Finished sinter handling (30%) at ore yard including: conveying, transfers, unloading and loading.

F007 (Raw Burden (Sinter Feed) Handling)
Raw burden handling including: conveying and transfers. Served by 'C' Baghouse.

P001 (Sinter Strand Windbox and Ignition Hood)
Sinter strand windbox exhaust served by 'Strand' baghouse.

P002 (Sinter Coolers A, B, C and D)
Finished sinter cooler sections B, C and D (A vented to strand) served by 'Cooler' baghouse.

P901 (Sintering Discharge End and Raw Mat'l/ Fines Surge Bins)

Sinter strand discharge end, burden storage bins including sinter fines handling, served by 'A' baghouse.

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:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

# PART I - GENERAL TERMS AND CONDITIONS

## A. State and Federally Enforceable Section

### 1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

   i. The date, place (as defined in the permit), and time of sampling or measurements.
   ii. The date(s) analyses were performed.
   iii. The company or entity that performed the analyses.
   iv. The analytical techniques or methods used.
   v. The results of such analyses.
   vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

   i. Reports of any required monitoring and/or recordkeeping of federally enforceable 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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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.6 below if no deviations occurred during the quarter.
   iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> 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 applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"); and, pursuant to 40 CFR 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 CFR Part 68 by the date specified in 40 CFR 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 CFR Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management 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 and to the Administrator of U.S. EPA in the following manner 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. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## 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 of state-only enforceable 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 state-only required 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. 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).

### 4. 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.

### 5. 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.

### 6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> 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

**1.** This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #49, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

## B. State Only Enforceable Section

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

Z001 Raw Burden Mixer Drum
Z002 Miscellaneous Maintenance Welding Stations

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:** Roads and Parking Areas (F001)

**Activity Description:** Paved and unpaved roadways and parking areas.

## 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| paved roadways and parking areas (see Section A.I.2.a) | OAC rule 3745-17-07(B)(4) | no visible particulate emissions except for six minutes during any sixty-minute observation 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.e and A.I.2.h through A.I.2.j) |
| unpaved roadways and parking areas (see Section A.I.2.b) | OAC rule 3745-17-07(B)(5) | no visible particulate emissions except for thirteen minutes during any sixty-minute observation 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.d through A.I.2.g, A.I.2.i and A.I.2.j) |

**2. Additional Terms and Conditions**

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

paved roadways:

All facility paved roadways

paved parking areas:

All facility paved parking areas

## 2. Additional Terms and Conditions (continued)

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

unpaved roadways:

All facility unpaved roadways

unpaved parking areas:

All facility unpaved parking areas

**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 sweeping and flushing 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 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 water or suitable dust suppression chemicals 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 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.f.** A maximum speed limit of 15 miles per hour on unpaved roads shall be posted and enforced on the property.

**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.** 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**

## III. Monitoring and/or Record Keeping Requirements

**1.** Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

| paved roadways and parking areas | minimum inspection frequency |
|---|---|
| All | Daily |

| unpaved roadways and parking areas | minimum inspection frequency |
|---|---|
| All | Daily |

**2.** The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions on days when the plant is operating and/or receiving raw material or loading-out sinter product. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

**3.** The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**4.** The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

## IV. Reporting Requirements

**1.** The permittee shall submit deviation reports that identify any of the following occurrences:

a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

**2.** The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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:** Raw Material and Product Storage Piles (F002)

**Activity Description:** Sintering raw feed materials and product storage piles in Ore Yard.

## 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| load-in and load-out of storage piles (see Section A.I.2.a for identification of storage piles) | OAC rule 3745-17-07 (B)(6) | no visible emissions except for thirteen minutes during any sixty-minute observation period |
| | OAC rule 3745-17-08 (B), (B)(6) | reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.b, A.I.2.c and A.I.2.f) |
| wind erosion from storage piles (see Section A.I.2.a for identification of storage piles) | OAC rule 3745-17-07 (B)(6) | no visible emissions except for thirteen minutes during any sixty-minute observation period |
| | OAC rule 3745-17-08 (B), (B)(6) | reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.d through A.I.2.f) |

**2. Additional Terms and Conditions**

**2.a.** The storage piles that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

BOF Slag Storage Piles
Blast Furnace Flue Dust Storage Piles
Dolomite Storage Piles
Limestone Storage Piles
Mill Scale Storage Piles
Pellet Fines Storage Piles
Sinter Storage Piles
Sinter Plant Baghouse Dust Storage Piles

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

**2.b.** The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with the storage piles 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 the precautionary operating practices of reducing material drop heights from front-end loader buckets and the reduction of storage pile heights. In addition, the raw material has an inherent high moisture content. The sinter product will be treated with sufficient dust suppression chemicals via spray nozzles in the sinter chutes on the stationary conveyor/stacker to control dust emissions during both load-in and load-out operations. These control methods will be supplemented by watering in the ore yard as needed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**2.c.** The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

**2.d.** The permittee shall employ reasonably available control measures for wind erosion from the surfaces of all storage piles 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 the precautionary operating practices of maintaining low raw material storage pile heights to ensure compliance. In addition, the ore yard raw materials have an inherent high moisture content and the storage piles are wind guard protected by buildings which will reduce wind erosion emissions. These control methods will be supplemented by watering in the ore yard as needed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**2.e.** The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile 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.

**2.f.** 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**

## III. Monitoring and/or Record Keeping Requirements

**1.** Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

| storage pile identification | minimum load-in inspection frequency |
|---|---|
| All | Weekly |

**2.** Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

| storage pile identification | minimum load-out inspection frequency |
|---|---|
| All | Weekly |

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

**3.** Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

| storage pile identification | minimum wind erosion inspection frequency |
|---|---|
| All | Weekly |

**4.** No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

**5.** The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

**6.** The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**7.** The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

## IV. Reporting Requirements

**1.** The permittee shall submit deviation reports that identify any of the following occurrences:

a. each week during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

**2.** The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

## V. Testing Requirements

**1.** Compliance with the visible emission limitations for the storage piles 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)(c) 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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:** Sinter Cooler Discharge End (F003)

**Activity Description:** Finished sinter discharge from cooler with pick-up points vented to cooler 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| sinter cooler discharge area (sinter cooler discharge conveyor and transfer points) vented to the sinter cooler baghouse | OAC rule 3745-17-07(B)(3) | Visible particulate emissions of fugitive dust from sintering operations, including fugitive emissions from the sinter cooler discharge area, shall not exceed twenty percent opacity as a six-minute average. |
| | OAC rule 3745-17-07(A) | Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the sinter cooler baghouse outlet shall not exceed twenty percent opacity as a six-minute average, determined in accordance with OAC rule 3745-17-03(B)(1). |

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | OAC rule 3745-17-08(B)(3) | The permittee shall use hoods and a booster fan to adequately enclose, contain, capture, vent and control the fugitive dust from the sinter cooler discharge end. Such equipment shall meet the following requirements:<br>(a) the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the sinter cooler discharge end to the extent possible with good engineering design; and<br>(b) the sinter cooler baghouse outlet achieves an outlet emission rate of not greater than .030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are no visible particulate emissions from the exhaust outlet, whichever is less stringent. |

**2. Additional Terms and Conditions**

**None**

## II. Operational Restrictions

**1.** Baghouse Operational Restrictions

The pressure drop across each baghouse compartment shall be maintained within the range of 0.2 to 2.5 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

**1.** Baghouse Pressure Drop Monitoring and Recordkeeping Requirements

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

**2.** The permittee shall perform inspections of the sinter cooler discharge end booster fan and fugitive dust capture system in accordance with the following frequencies:

| sinter cooler discharge end | minimum inspection frequency |
|---|---|
| Booster Fan<br>and<br>Fugitive Dust Capture System | Weekly |

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

**3.** The purpose of the inspections is to ensure that the collection efficiency provided by the booster fan and fugitive dust capture system is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the sinter cooler discharge end to the extent possible with good engineering design. The inspections shall be performed during representative, normal operating conditions.

**4.** The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**5.** The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed;

b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the booster fan or fugitive dust capture system;

c. the dates that any repair or maintenance of the booster fan or fugitive dust capture system was performed.

## IV. Reporting Requirements

**1.** Baghouse Pressure Drop Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any baghouse compartment did not comply with the allowable range specified above.

**2.** The permittee shall submit deviation reports that identify any of the following occurrences:

a. each week during which an inspection was not performed by the required frequency; and

b. each instance when maintenance or repair of the booster fan or fugitive dust capture system, that was to be performed as a result of an inspection, was not performed.

**3.** The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

## V. Testing Requirements

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

**1.a.** Emission Limitation:

Visible particulate emissions of fugitive dust from sintering operations, including fugitive emissions from the sinter cooler discharge area, shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

**1.b.** Emission Limitation:

Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the sinter cooler baghouse outlet shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

## V. Testing Requirements (continued)

**1.c.** Emission Limitation:

Particulate matter emissions from the sinter cooler baghouse outlet shall achieve an emission rate of not greater than .030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust outlet, whichever is less stringent.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(7)

**2.** The permittee shall conduct, or have conducted, emission testing of the sinter cooler baghouse in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate(s) for particulate emissions.

c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5D of 40 CFR, Part 60, Appendix A.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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:** Raw Material Unloading, Transfer, Conveying & Storage (F004)

**Activity Description:** Raw materials handling including: unloading, screening, conveying, transfers and surge bins.

## 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| raw material handling operations (conveyor and storage bin loading, belt conveying and transfer points) | OAC rule 3745-17-07(B) | Visible particulate emissions of fugitive dust from the raw material handling operations shall not exceed twenty percent opacity as a three-minute average. |
| | OAC rule 3745-17-08(B) | reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.b through A.I.2.d) |

**2. Additional Terms and Conditions**

**2.a.** The raw material handling operations that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

i. Rotary Car Dumper Loading Area

BOF Slag Handling
Blast Furnace Flue Dust/Sludge Handling
Mill Scale Handling
Pellet Fines Handling
Sinter Plant Baghouse Dust Handling

ii. Limestone/Dolomite Conveyor Loading Area

Dolomite and Limestone Handling

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

**2.b.** The permittee shall employ reasonably available control measures on all raw material load-in and load-out operations including truck unloading, conveyor loading, raw feed material surge bins, screening, mixing, conveying, and transfers associated with raw material handling 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 the precautionary operating practices of reducing raw material drop heights from front-end loader buckets and the maintenance of the existing partial enclosures of the belt conveyors in the raw material storage area. The raw material has an inherent high moisture content. However, chemical dust suppression shall be employed, as needed, at the rotary car dumper loading area and the limestone/dolomite conveyor loading area to control fugitive dust emissions during both load-in and load-out operations. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**2.c.** The above-mentioned control measure(s) shall be employed for the load-in and load-out raw material handling operations if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

**2.d.** 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**

## III. Monitoring and/or Record Keeping Requirements

**1.** Except as otherwise provided in this section, the permittee shall perform inspections of each raw material handling operation in accordance with the following frequencies:

| raw material handling operation | minimum inspection frequency |
|---|---|
| All | Weekly |

**2.** No inspection shall be necessary for any raw material handling operation if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

**3.** The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for raw material handling operations. The inspections shall be performed during representative normal material handling operating conditions.

**4.** The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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

**5.** The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where precipitation was sufficient to not require the control measure(s).

The information required in 5.d. shall be kept separately for each raw material handling operation and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

## IV. Reporting Requirements

**1.** The permittee shall submit deviation reports that identify any of the following occurrences:

a. each week during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

**2.** The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

## V. Testing Requirements

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

**1.a.** Emission Limitation:

Visible particulate emissions of fugitive dust from the raw material handling operations shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

## 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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:** Hi-Line Truck Load-out Station (F005)

**Activity Description:** Finished sinter handling (70%) at high line load-out station served by dedicated section of 'Cooler' 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| sinter load-out station (high-line truck load-out station) (temporary sinter storage bins, conveyors and transfer chutes) vented to the high-line sinter load-out station baghouse | OAC rule 3745-17-07(B) | Visible particulate emissions of fugitive dust from the high-line sinter load-out station shall not exceed twenty percent opacity as a three-minute average. |
| | OAC rule 3745-17-07(A) | Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the high-line sinter load-out station baghouse outlet shall not exceed twenty percent opacity as a six-minute average, determined in accordance with OAC rule 3745-17-03(B)(1). |

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | OAC rule 3745-17-08(B)(3) | The permittee shall use local capture hoods and the existing partial enclosures and fan to adequately enclose, contain, capture, vent and control fugitive dust from the high-line sinter load-out station. Such equipment shall meet the following requirements:<br>(a) the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the high-line sinter load-out station to the extent possible with good engineering design; and<br>(b) the baghouse outlet achieves a particulate emission rate of not greater than .030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are no visible particulate emissions from the exhaust outlet, whichever is less stringent. |

**2. Additional Terms and Conditions**

**None**

## II. Operational Restrictions

**1.** Baghouse Operational Restrictions

The pressure drop across the baghouse compartment shall be maintained within the range of 0.2 to 2.5 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

**1.** Baghouse Pressure Drop Monitoring and Recordkeeping Requirements

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

**2.** The permittee shall perform inspections of the high-line sinter load-out station fan and fugitive dust capture system in accordance with the following frequencies:

| high-line sinter load-out station | minimum inspection frequency |
|---|---|
| Fan and Fugitive Dust Capture System | Weekly |

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

**3.** The purpose of the inspections is to ensure that the collection efficiency provided by the fan and fugitive dust capture system is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the high-line sinter load-out station to the extent possible with good engineering design. The inspections shall be performed during representative, normal operating conditions.

**4.** The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**5.** The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed;

b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the fan or fugitive dust capture system;

c. the dates that any repair or maintenance of the fan or fugitive dust capture system was performed.

## IV. Reporting Requirements

**1.** Baghouse Pressure Drop Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse compartment did not comply with the allowable range specified above.

**2.** The permittee shall submit deviation reports that identify any of the following occurrences:

a. each week during which an inspection was not performed by the required frequency; and

b. each instance when maintenance or repair of the fan
or fugitive dust capture system, that was to be performed as a result of an inspection, was not performed.

**3.** The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

## V. Testing Requirements

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

**1.a.** Emission Limitation:

Visible particulate emissions of fugitive dust from the high-line sinter load-out station shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3).

**1.b.** Emission Limitation:

Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the high-line sinter load-out station baghouse outlet shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1).

## V. Testing Requirements (continued)

**1.c.** Emission Limitation:

Particulate matter emissions from the high-line sinter load-out station baghouse outlet shall achieve an emission rate of not greater than .030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the baghouse exhaust outlet, whichever is less stringent.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing the high-line sinter load-out station baghouse in accordance with OAC rule 3745-17-03(B)(7).

**2.** If required, the permittee shall conduct, or have conducted, emission testing of the high-line sinter load-out station baghouse in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after notification by the Ohio EPA that an emission test is required.

b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate(s) for particulate emissions.

c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5D of 40 CFR, Part 60, Appendix A.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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:** Truck Load-out (Ore Yard) (F006)

**Activity Description:** Finished sinter handling (30%) at ore yard including: conveying, transfers, unloading and loading.

## 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| sinter load-out station (ore-yard truck load-out station) (storage bins, conveyors, belt-to-belt transfers and transfer chutes) | OAC rule 3745-17-07(B) | Visible particulate emissions of fugitive dust from the ore-yard sinter load-out station shall not exceed twenty percent opacity as a three-minute average. |
| | OAC rule 3745-17-08(B) | reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.b and A.I.2.c) |

**2. Additional Terms and Conditions**

**2.a.** The ore-yard sinter load-out station equipment and operations that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

Sinter Storage Bins
Sinter Conveyors
Belt-to-Belt Transfers of Sinter
Sinter Transfer Chutes

**2.b.** The permittee shall employ reasonably available control measures on all ore-yard sinter load-out station equipment and operations including sinter storage bins, sinter conveyors, belt-to-belt transfers of sinter, sinter transfer chutes and truck loading 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 the maintenance of the existing partial enclosures of the sinter belt conveyors and the application of chemical dust suppression at the ore-yard sinter load-out station belt-to-belt and chute transfer points to control fugitive dust emissions during load-out operations. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**2.c.** 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**

## III. Monitoring and/or Record Keeping Requirements

**1.** Except as otherwise provided in this section, the permittee shall perform inspections of the ore-yard sinter load-out station operations in accordance with the following frequencies:

| ore-yard sinter load-out station operations | minimum inspection frequency |
|---|---|
| All | Weekly |

**2.** No inspection shall be necessary for ore-yard sinter load-out station operations if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

**3.** The purpose of the inspections is to determine the need for implementing or supplementing the control measures specified in this permit for ore-yard sinter load-out station operations. The inspections shall be performed during representative normal ore-yard sinter load-out operating conditions.

**4.** The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**5.** The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the specified control measures;

c. the dates that supplemental control measures were required to be implemented; and

d. on a calendar quarter basis, the total number of days that the control measures were required and the total number of days where precipitation was sufficient to not require the control measure(s).

The information required in 5.d. shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

## IV. Reporting Requirements

**1.** The permittee shall submit deviation reports that identify any of the following occurrences:

a. each week during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for precipitation; and

b. each instance, resulting from an inspection, when a control measure necessary to ensure compliance with the above-mentioned applicable requirements, was not implemented.

**2.** The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

## V. Testing Requirements

**1.** Compliance with the emissions limitations in Sections 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:

Visible particulate emissions of fugitive dust from the ore-yard sinter load-out station shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

## 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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:** Raw Burden (Sinter Feed) Handling (F007)

**Activity Description:** Raw burden handling including: conveying and transfers. Served by 'C' 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| raw burden (sinter feed) handling (including belt conveying and transfers) vented to "C" baghouse | OAC rule 3745-17-07(B) | Visible particulate emissions of fugitive dust from the raw burden (sinter feed) handling shall not exceed twenty percent opacity as a three-minute average. |
| | OAC rule 3745-17-07(A) | Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the raw burden (sinter feed) handling "C" baghouse stack shall not exceed twenty percent opacity as a six-minute average, determined in accordance with OAC rule 3745-17-03(B)(1). |
| | OAC rule 3745-17-08(B)(3) | The permittee shall use the existing partial enclosures and fan to adequately enclose, contain, capture, vent and control fugitive dust from raw burden (sinter feed) handling including belt conveying and transfers. Such equipment shall meet the following requirements: (a) the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust from raw burden (sinter feed) handling to the extent possible with good engineering design; and (b) the "C" baghouse stack achieves a particulate emission rate of not greater than .030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are no visible particulate emissions from the exhaust stack, whichever is less stringent. |

**2. Additional Terms and Conditions**

**None**

## II. Operational Restrictions

**1.** Baghouse Operational Restrictions

The pressure drop across the baghouse shall be maintained within the range of 1.0 to 5.0 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

**1.** Baghouse Pressure Drop Monitoring and Recordkeeping Requirements

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

**2.** The permittee shall perform inspections of the raw burden (sinter feed) handling fan and fugitive dust capture system in accordance with the following frequencies:

| raw burden (sinter feed) handling | minimum inspection frequency |
|---|---|
| Fan and Fugitive Dust Capture System | Weekly |

**3.** The purpose of the inspections is to ensure that the collection efficiency provided by the fan and fugitive dust capture system is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the raw burden (sinter feed) handling to the extent possible with good engineering design. The inspections shall be performed during representative, normal operating conditions.

**4.** The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**5.** The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed;

b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the fan or fugitive dust capture system;

c. the dates that any repair or maintenance of the fan or fugitive dust capture system was performed.

## IV. Reporting Requirements

**1.** Baghouse Pressure Drop Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

**2.** The permittee shall submit deviation reports that identify any of the following occurrences:

a. each week during which an inspection was not performed by the required frequency; and

b. each instance when maintenance or repair of the fan
or fugitive dust capture system, that was to be performed as a result of an inspection, was not performed.

**3.** The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

## V. Testing Requirements

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

**1.a.** Emission Limitation:

Visible particulate emissions of fugitive dust from the raw burden (sinter feed) handling shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3).

**1.b.** Emission Limitation:

Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the raw burden (sinter feed) handling "C" baghouse stack shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1).

**1.c.** Emission Limitation:

Particulate matter emissions from the "C" baghouse stack achieves a particulate emission rate of not greater than .030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there are no visible particulate emissions from the exhaust stack, whichever is less stringent.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing the raw burden (sinter feed) handling "C" baghouse in accordance with OAC rule 3745-17-03(B)(7).

**2.** If required, the permittee shall conduct, or have conducted, emission testing of the raw burden (sinter feed) handling "C" baghouse in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after notification by the Ohio EPA that an emission test is required.

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

c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5 of 40 CFR, Part 60, Appendix A.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

## V. Testing Requirements (continued)

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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:** Sinter Strand Windbox and Ignition Hood (P001)

**Activity Description:** Sinter strand windbox exhaust served by 'Strand' 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| sinter strand windbox and ignition hood | OAC rule 3745-17-08(B) | The permittee shall use the primary capture hood, existing enclosure and fan to adequately enclose, contain, capture and vent particulate emissions of fugitive dust from the sinter strand windbox and ignition hood to the sinter strand windbox baghouse. Such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the sinter strand windbox and ignition hood to the extent possible with good engineering design. |
| | OAC rule 3745-17-07(B)(3) | Visible particulate emissions of fugitive dust from sintering operations, including fugitive emissions from the sinter strand windbox and ignition hood, shall not exceed twenty percent opacity as a six-minute average. |
| | OAC rule 3745-17-07(A) | Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the sinter machine strand windbox stack shall not exceed twenty percent opacity as a six-minute average, determined in accordance with OAC rule 3745-17-03(B)(1). |
| | OAC rule 3745-17-11 | Particulate matter emissions from the sinter machine strand windbox stack shall not exceed 50 pounds per hour based on Figure II of OAC rule 3745-17-11. |

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | OAC rule 3745-18-56(H) | Sulfur dioxide emissions from the sinter machine strand windbox stack shall not exceed 3.3 pounds of sulfur dioxide per ton of process weight. |

**2. Additional Terms and Conditions**

**None**

## II. Operational Restrictions

**1.** Baghouse Operational Restrictions

The pressure drop across the baghouse shall be maintained within the range of 7.0 to 14.0 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

**1.** Baghouse Pressure Drop Monitoring and Recordkeeping Requirements

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

**2.** The permittee shall perform inspections of the sinter strand windbox and ignition hood fan and fugitive dust capture system in accordance with the following frequencies:

| sinter strand windbox and ignition hood | minimum inspection frequency |
|---|---|
| Fan and Fugitive Dust Capture System | Weekly |

**3.** The purpose of the inspections is to ensure that the collection efficiency provided by the fan and fugitive dust capture system is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the sinter strand windbox and ignition hood to the extent possible with good engineering design. The inspections shall be performed during representative, normal operating conditions.

**4.** The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**5.** The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed;

b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the fan or fugitive dust capture system;

c. the dates that any repair or maintenance of the fan or fugitive dust capture system was performed.

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

**6.** Requirements for the Sampling and Analysis of Sinter Burden Material, Sinter Product and Strand Windbox Baghouse Dust

The permittee shall collect representative grab samples of the sinter burden material, sinter product and strand windbox baghouse dust on a frequency of once per operating day. Samples of sinter burden material, sinter product and strand windbox baghouse dust shall be collected from appropriate representative locations. At the end of each calendar month, all of the grab samples of each material collected during that calendar month shall be combined into three individual composite samples.

Each of the monthly composite samples shall be analyzed for sulfur content (percent). The analytical methods for sulfur content shall be proposed by the permittee for approval by the Ohio EPA Northeast District Office. Alternative, equivalent methods may be required by the Ohio EPA Northeast District Office if the proposed methods are rejected by the Ohio EPA.

**7.** Recordkeeping Requirements for Sinter Burden Material (Process Weight), Sinter Product, Strand Windbox Baghouse Dust and Quality

The permittee shall maintain monthly records of the total quantity of sinter burden material used, sinter product, strand windbox baghouse dust collected and the results of the three composite sample analyses for sulfur content.

**8.** Recordkeeping Requirements for the Calculated Monthly Average Sulfur Dioxide Emissions Rate

The permittee shall maintain monthly records of the average sulfur dioxide emissions rate calculated in accordance with the formula specified in Section A.V.1.d.

## IV. Reporting Requirements

**1.** Baghouse Pressure Drop Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

**2.** The permittee shall submit deviation reports that identify any of the following occurrences:

a. each week during which an inspection was not performed by the required frequency; and

b. each instance when maintenance or repair of the fan or fugitive dust capture system, that was to be performed as a result of an inspection, was not performed.

**3.** The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

## IV. Reporting Requirements (continued)

**4.** Reporting Requirements for Sinter Burden Material (Process Weight), Sinter Product, Strand Windbox Baghouse Dust and Quality Data

Quarterly reports shall be submitted concerning the quality and quantity of sinter burden material used, sinter product and strand windbox baghouse dust from this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

(a) the total quantity of sinter burden material used, sinter production and strand windbox baghouse dust collected (pounds);

(b) the sulfur contents (percent) of the composite samples of sinter burden material, sinter product and strand windbox baghouse dust; and

(c) the average sulfur dioxide emissions rate [pounds sulfur dioxide/ton of process weight (sinter burden material)] from the sinter strand windbox stack.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the data obtained during the previous calendar quarters.

## V. Testing Requirements

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

**1.a.** Emission Limitation:

Visible particulate emissions of fugitive dust from sintering operations, including fugitive emissions from the sinter strand windbox and ignition hood, shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3).

**1.b.** Emission Limitation:

Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the sinter machine strand windbox stack shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1).

**1.c.** Emission Limitation:

Particulate matter emissions from the sinter machine strand windbox stack shall not exceed 50 pounds per hour based on Figure II of OAC rule 3745-17-11.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(10)

## V. Testing Requirements (continued)

**1.d.** Emission Limitation:

Sulfur dioxide emissions from the sinter machine strand windbox stack shall not exceed 3.3 pounds of sulfur dioxide per ton of process weight.

Applicable Compliance Method:

Stack testing in accordance with OAC rule 3745-18-04(A) and as required by section V.2;

Compliance shall also be demonstrated based upon the monitoring and record keeping requirements in sections III.2 and III.3. The average sulfur dioxide emissions rate [pounds sulfur dioxide/ton of process weight (sinter burden material)] from the sinter strand windbox stack shall be calculated as follows:

ER = (2) * [(B)(QB)-(S)(QS)-(D)(QD)] / (QB/2000)

where: ER = the average sulfur dioxide emissions rate in pounds of sulfur dioxide per ton of process weight;
B = the decimal fraction of sulfur in the sinter burden material (process weight) from the composite sample analyses;
S = the decimal fraction of sulfur in the sinter product from the composite sample analyses;
D = the decimal fraction of sulfur in the strand windbox baghouse dust from the composite sample analyses;
QB = the total quantity of sinter burden material used (pounds);
QS = the total quantity of sinter produced (pounds);
QD = the total quantity of strand windbox baghouse dust collected (pounds).

**2.** The permittee shall conduct, or have conducted, emission testing of the sinter machine strand windbox in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate(s) for particulate emissions and sulfur dioxide.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): Methods 5 and 6 of 40 CFR, Part 60, Appendix A.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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:** Sinter Coolers A, B, C and D (P002)

**Activity Description:** Finished sinter cooler sections B, C and D (A vented to strand) served by 'Cooler' 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| sinter coolers A, B, C and D | OAC rule 3745-17-11 | See Sections A.I.2.a and A.I.2.b. |
| | OAC rule 3745-17-08(B) | The permittee shall use the existing enclosure and fans to adequately enclose, contain, capture and vent particulate emissions of fugitive dust from sinter cooler A to the sinter strand and particulate emissions of fugitive dust from sinter coolers B, C and D to the sinter cooler baghouse. Such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust from sinter coolers A, B, C and D to the extent possible with good engineering design. |
| | OAC rule 3745-17-07(B)(3) | Visible particulate emissions of fugitive dust from sintering operations, including fugitive emissions from the sinter coolers, shall not exceed twenty percent opacity as a six-minute average. |
| sinter cooler baghouse (sinter coolers B, C and D) | OAC rule 3745-17-07(A) | Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the sinter cooler baghouse shall not exceed twenty percent opacity as a six-minute average, determined in accordance with OAC rule 3745-17-03(B)(1). |

### 2. Additional Terms and Conditions

**2.a.** Particulate emissions from the sinter cooler A discharge shall be captured and ducted directly to the sinter strand. The sinter cooler A discharge shall be injected through hoods over the sinter bed, providing preheated air and recycling particulate emissions from sinter cooler A to the sinter strand.

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

**2.b.** Particulate matter emissions from the sinter coolers A, B, C and D shall not exceed 42.93 pounds per hour combined based on Figure II of OAC rule 3745-17-11.

## II. Operational Restrictions

**1.** Baghouse Operational Restrictions

The pressure drop across each baghouse compartment shall be maintained within the range of 0.2 to 2.5 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

**1.** Baghouse Pressure Drop Monitoring and Recordkeeping Requirements

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

**2.** The permittee shall perform inspections of the sinter coolers A, B, C and D fans and fugitive dust capture systems in accordance with the following frequencies:

| sinter coolers A, B, C and D | minimum inspection frequency |
|---|---|
| Fans and Fugitive Dust Capture Systems | Weekly |

**3.** The purpose of the inspections is to ensure that the collection efficiency provided by the fans and fugitive dust capture systems are sufficient to minimize or eliminate visible particulate emissions of fugitive dust from sinter coolers A, B, C and D to the extent possible with good engineering design. The inspections shall be performed during representative, normal operating conditions.

**4.** The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**5.** The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed;

b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the fans or fugitive dust capture systems;

c. the dates that any repair or maintenance of the fans or fugitive dust capture systems was performed.

## IV. Reporting Requirements

**1.** Baghouse Pressure Drop Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across a baghouse compartment did not comply with the allowable range specified above.

## IV. Reporting Requirements (continued)

**2.** The permittee shall submit deviation reports that identify any of the following occurrences:

a. each week during which an inspection was not performed by the required frequency; and

b. each instance when maintenance or repair of the fans or fugitive dust capture systems, that was to be performed as a result of an inspection, was not performed.

**3.** The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

## V. Testing Requirements

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

**1.a.** Emission Limitation:

Visible particulate emissions of fugitive dust from sintering operations, including fugitive emissions from the sinter coolers, shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3).

**1.b.** Emission Limitation:

Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the sinter cooler baghouse shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1).

**1.c.** Emission Limitation:

Particulate matter emissions from the sinter coolers A, B, C and D shall not exceed 42.93 pounds per hour combined based on Figure II of OAC rule 3745-17-11.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(10)

**2.** The permittee shall conduct, or have conducted, emission testing of the sinter cooler baghouse in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.

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

c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5D of 40 CFR, Part 60, Appendix A.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

## V. Testing Requirements (continued)

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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:** Sintering Discharge End and Raw Mat'l/ Fines Surge Bins (P901)

**Activity Description:** Sinter strand discharge end, burden storage bins including sinter fines handling, served by 'A' 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.

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| sintering discharge end and raw material / fines surge bins (sinter machine discharge end and associated finished sinter conveyor transfer points, sinter burden (raw mix feed) and sinter fines surge bins and associated conveyor transfer points) vented to a baghouse | OAC rule 3745-17-07(A) | Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the sintering discharge end and raw material / fines surge bins baghouse stack shall not exceed twenty percent opacity as a six-minute average, determined in accordance with OAC rule 3745-17-03(B)(1). |
| | OAC rule 3745-17-11 | Particulate matter emissions from the sintering discharge end and raw material / fines surge bins baghouse shall not exceed 50 pounds per hour based on Figure II of OAC rule 3745-17-11. |
| | OAC rule 3745-17-07(B) | Visible particulate emissions of fugitive dust from the sintering discharge end and raw material / fines surge bins shall not exceed twenty percent opacity as a three-minute average. |
| | OAC rule 3745-17-08(B) | The permittee shall use local hoods, fan and baghouse to adequately enclose, contain, capture, vent and control the fugitive dust from the sintering discharge end and raw material / fines surge bins. Such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust from the sintering discharge end and raw material / fines surge bins to the extent possible with good engineering design. |

**2. Additional Terms and Conditions**

**None**

## II. Operational Restrictions

**1.** Baghouse Operational Restrictions

The pressure drop across the baghouse shall be maintained within the range of 4.0 to 9.0 inches of water while the emissions unit is in operation.

## III. Monitoring and/or Record Keeping Requirements

**1.** Baghouse Pressure Drop Monitoring and Recordkeeping Requirements

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

**2.** The permittee shall perform inspections of the sintering discharge end and raw material / fines surge bins fan and fugitive dust capture system in accordance with the following frequencies:

| sintering discharge end and raw material / fines surge bins | minimum inspection frequency |
|---|---|
| Fan and Fugitive Dust Capture System | Weekly |

**3.** The purpose of the inspections is to ensure that the collection efficiency provided by the fan and fugitive dust capture system is sufficient to minimize or eliminate visible particulate emissions of fugitive dust from sintering discharge end and raw material / fines surge bins to the extent possible with good engineering design. The inspections shall be performed during representative, normal operating conditions.

**4.** The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

**5.** The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed;

b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the fan or fugitive dust capture system;

c. the dates that any repair or maintenance of the fan or fugitive dust capture system was performed.

## IV. Reporting Requirements

**1.** Baghouse Pressure Drop Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.

**2.** The permittee shall submit deviation reports that identify any of the following occurrences:

a. each week during which an inspection was not performed by the required frequency; and

b. each instance when maintenance or repair of the fan or fugitive dust capture system, that was to be performed as a result of an inspection, was not performed.

## IV. Reporting Requirements (continued)

**3.** The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

## V. Testing Requirements

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

**1.a.** Emission Limitation:

Except as otherwise specified in paragraph (A)(1) to (A)(3) of OAC rule 3745-17-07, visible particulate emissions from the sintering discharge end and raw material / fines surge bins baghouse stack shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

**1.b.** Emission Limitation:

Particulate matter emissions from the sintering discharge end and raw material / fines surge bins baghouse shall not exceed 50 pounds per hour based on Figure II of OAC rule 3745-17-11.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(10)

**1.c.** Emission Limitation:

Visible particulate emissions of fugitive dust from the sintering discharge end and raw material / fines surge bins shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

OAC rule 3745-17-03(B)(3)

**2.** The permittee shall conduct, or have conducted, emission testing of the sintering discharge end and raw material / fines surge bins "A" baghouse in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate(s) for particulate emissions.

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

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

## V. Testing Requirements (continued)

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

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

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test(s).

## VI. Miscellaneous Requirements

**None**

## B. State Enforceable Section

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

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

| Operations, Property, and/or Equipment | Applicable Rules/ Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|

**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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