



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

03/31/00

**CERTIFIED MAIL**

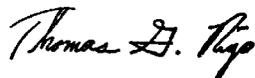
**RE: Proposed Title V Chapter 3745-77 permit**  
15-76-00-0378  
J & L Specialty Steel, Inc.

Attn: Genevieve Damico AR-18J  
United States Environmental Protection Agency  
Region V  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for J & L Specialty Steel, Inc., has been created in Ohio EPA's State Air Resources System (STARS) on 03/31/00, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's electronic notification of this proposed action. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 before the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,



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

cc: Canton Division of Air Pollution Control  
Becky Castle, DAPC PMU



## Ohio EPA

State of Ohio Environmental Protection Agency

### PROPOSED TITLE V PERMIT

Date: 03/31/00

Effective Date:

Expiration Date:

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

This document constitutes issuance to:

J & L Specialty Steel, Inc.  
1500 West Main Street  
Louisville, OH 44641

of a Title V permit for Facility ID: 15-76-00-0378

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

B001 (Boiler #4 - Erie)  
Erie Boiler #4

B002 (Boiler #3 - Wickes  
)  
Wickes Boiler #3

F002 (Vehicular traffic)  
Plant-wide Vehicular Traffic

P004 (#1 HAP pickle baths)  
#1 Hot Anneal & Pickling Line Pickling Tanks #1, #2, & #3

P005 (#2 HAP pickle baths)  
#2 Hot Anneal & Pickling Line Pickling Tanks #1, #2, & #3

P006 (#1 CAP - Preheat anneal furnace)  
#1 Cold Anneal & Pickling Line Preheat Furnace

P009 (#2 HAP - 8 head shot blaster  
)  
#2 Hot Anneal & Pickling Line Wheelabrator Shotblaster

P010 (#2 HAP - Equalizer anneal furnace)  
#2 Hot Anneal & Pickling Line Equalizing Furnace

P011 (#2 HAP - Preheat anneal furnace)  
#2 Hot Anneal & Pickling Line Preheat Furnace

P012 (#1 HAP - Equalizer anneal furnace)  
)  
#1 Hot Anneal & Pickling Line Equalizing Furnace

P013 (#1 HAP - Preheat anneal furnace)  
#1 Hot Anneal & Pickling Line Preheat Furnace

P017 (#2 CAP - Preheat #1 anneal furnace)  
#2 Cold Anneal & Pickling Line Preheat Furnace #1

P018 (#2 CAP - Preheat #2 anneal furnace)  
#2 Cold Anneal & Pickling Line Preheat Furnace #2

P019 (#2 CAP - pickling baths)  
#2 Cold Anneal & Pickling Line Pickling Tanks #1, #2, & #3

P024 (#2 CAP - Equalizer anneal furnace)  
#2 Cold Anneal & Pickling Line Equalizing Furnace

P025 (#1 HAP - 4 head shot blaster)  
#1 Hot Anneal & Pickling Line Pangborn Shotblaster

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

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

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

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Christopher Jones  
Director

# PART I - GENERAL TERMS AND CONDITIONS

## A. State and Federally Enforceable Section

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

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping 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 emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.
  - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

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

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

## **3. Risk Management Plans**

If 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 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 Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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

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

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

**None**

## B. State Only Enforceable Section

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

F001 - material handling  
G001 - gasoline tank  
P014 - bell hood anneal furnaces 6  
P015 - #1 cross cut saws  
P016 - #1 weld station  
P020 - caustic rinse tank  
P021 - #2 CAP steam superheater  
P022 - #2 caustic tank rinse heater  
P023 - #2 CAP caustic wash tank  
T001 - #2 fuel oil tank 120,000 gal.  
Z001 - #1HAP strip welder  
Z002 - #2 HAP strip welder  
Z003 - #1 CAP resistance welder  
Z004 - #1 CAP oil wiper  
Z005 - #1 CAP caustic tank heater  
Z006 - #2 CAP resistance welder  
Z007 - BA strip welder  
Z008 - #1 dryer  
Z009 - Z mill  
Z010 - temper mill  
Z011 - 44" mill  
Z012 - basement oilhouse vent  
Z013 - #19 weld station  
Z014 - WWTP building heat  
Z015 - space heaters  
Z016 - 4 degreasers  
Z017 - solvent cleaning degreasing  
Z018 - salt tank  
Z019 - waste acid cisterns  
Z101 - clean mill oil tank  
Z102 - clean hydraulic oil tank  
Z103 - 44" mill oil tank L4  
Z104 - 44" mill oil tank L5  
Z105 - dirty mill oil tank  
Z106 - dirty hydraulic oil tank  
Z107 - tramp oil tank A  
Z108 - tramp oil tank B  
Z109 - cracker tank  
Z110 - tramp oil tank C  
Z111 - waste oil tank  
Z112 - H2SO4 storage tank  
Z113 - HNO3 storage tank  
Z114 - HNO3 storage tank  
Z115 - HF storage tank  
Z116 - HNO3 storage tank  
Z117 - ferrous chloride tank  
Z119 - oil skimmer holding tank  
Z120 - BA caustic wash tank  
Z121 - BA dryer #2  
Z122 - BA dryer #2  
Z123 - BA line cooling line  
Z124 - lime silos  
Z125 - #2 CAP hot air dryer  
Z126 - #1 CAP caustic tank  
Z127 - refrigerants

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

Facility Name: **J & L Specialty Steel, Inc.**  
Facility ID: **15-76-00-0378**

**B. State Only Enforceable Section**

emissions unit

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

**Emissions Unit ID:** Boiler #4 - Erie (B001)  
**Activity Description:** Erie Boiler #4

**A. State and Federally Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Erie City boiler #4, 150 MMBtu/hr natural gas or no. 2 oil firing capability	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/MMBtu of actual heat input.
	OAC rule 3745-18-06(D)	Sulfur dioxide emissions (SO <sub>2</sub> ) shall not exceed 1.6 lbs/MMBtu of actual heat input.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

- The permittee shall burn only natural gas and/or no. 2 fuel oil in this emissions unit. The fuel oil burned in this emissions unit shall be limited in sulfur concentrations to ensure compliance with the allowable sulfur dioxide emission restriction expressed in section A.I.1.

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

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content. The permittee shall calculate the sulfur dioxide emission rate (lbs/MMBtu) for each shipment in accordance with the formula specified in OAC rule 3745-18-04(F).

$$ER = (1 \times 10^6 / H) \times (D) \times (S) \times (1.974)$$

where:

ER = the emission rate in pounds of sulfur dioxide per MMBtu;  
H = is the heat value of the liquid fuel in Btu/gallon;  
D = the density of the liquid fuel in pounds per gallon; and  
S = the decimal fraction of sulfur in the liquid fuel.

Also, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during each calendar month.

2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Canton local air agency.
3. For each day during which the permittee burns a fuel other than natural gas and/or number two oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any monthly record which shows a deviation of the allowable sulfur dioxide emission limitation in section A.I, based upon a volume-weighted average of the calculated sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## V. Testing Requirements

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

Emission Limitation -  
0.020 lb PM/MMBtu actual heat input.

Applicable Compliance Method -

For natural gas fuel, compliance shall be based upon multiplying the maximum hourly fuel flow rate (MMscf/hr) by the AP-42 emission factor (1.9 lb PM/MMscf) and dividing the product by the maximum heat input (150 MMBtu/hr).

When firing No. 2 oil, compliance shall be based upon multiplying the maximum hourly No. 2 oil flow (1000 gal/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs PM/1000gal) and by dividing the product by the maximum heat input (150 MMBtu/hr).

If required, this facility shall conduct, or have conducted, an emissions test for this emissions unit in order to demonstrate compliance with the allowable mass emissions rate for particulates. The emissions test shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03. The test shall be conducted at maximum capacity unless otherwise specified or approved by the Canton local air agency.

2. Emission Limitation -  
20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

3. Emission Limitation -  
1.6 lbs SO<sub>2</sub>/MMBtu actual heat input

Applicable Compliance Method -

Compliance shall be demonstrated by the recordkeeping requirements in section A.III. 1 and 2. If testing is required to demonstrate compliance with the allowable emission limitation of 1.6 lbs SO<sub>2</sub>/MMBtu of actual heat input, the testing shall be conducted using the following method:  
40 CFR Part 60, Appendix A, Method 6.

When firing natural gas, compliance with this limitation will be assumed due to the negligible concentration of sulfur, by weight, in the fuel.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Erie City boiler #4, 150 MMBtu/hr  
natural gas or No. 2 oil firing  
capability

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** Boiler #3 - Wickes (B002)  
**Activity Description:** Wickes Boiler #3

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wickes boiler #3, 100 MMBtu natural gas or No. 2 fuel oil.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/MMBtu of actual heat input.
	OAC rule 3745-18-06(D)	Sulfur dioxide emissions (SO <sub>2</sub> ) shall not exceed 1.6 lbs/MMBtu of actual heat input.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit. The fuel oil burned in this emissions unit shall be limited in sulfur concentrations to ensure compliance with the allowable sulfur dioxide emission restriction expressed in Section A.I.1.

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

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content. The permittee shall calculate the sulfur dioxide emission rate (lbs/MMBtu) for each shipment in accordance with the formula specified in OAC rule 3745-18-04(F).

$$ER = (1 \times 10^6 / H) \times (D) \times (S) \times (1.974)$$

where:

ER = the emission rate in pounds of sulfur dioxide per MMBtu;  
H = is the heat value of the liquid fuel in Btu/gallon;  
D = the density of the liquid fuel in pounds per gallon; and  
S = the decimal fraction of sulfur in the liquid fuel.

Also, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during each calendar month.

2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Canton local air agency.
3. For each day during which the permittee burns a fuel other than natural gas and/or number two oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

### IV. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any monthly record which shows a deviation of the allowable sulfur dioxide emission limitation in section A.I, based upon a volume-weighted average of the calculated sulfur dioxide emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## V. Testing Requirements

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

Emission Limitation -  
0.020 lb PM/MMBtu actual heat input.

Applicable Compliance Method -

For natural gas fuel, compliance shall be based upon multiplying the maximum hourly fuel flow rate (MMscf/hr) by the AP-42 emission factor (1.9 lb PM/MMscf) and dividing the product by the maximum heat input (100 MMBtu/hr).

When firing No. 2 oil, compliance shall be based upon multiplying the maximum hourly No. 2 oil flow (1000 gal/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs PM/1000gal) and by dividing the product by the maximum heat input (100 MMBtu/hr).

If required, this facility shall conduct, or have conducted, an emissions test for this emissions unit in order to demonstrate compliance with the allowable mass emissions rate for particulates. The emissions test shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03. The test shall be conducted at maximum capacity rates unless otherwise specified or approved by the Canton local air agency.

2. Emission Limitation -  
20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method -

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

3. Emission Limitation -  
1.6 lbs SO<sub>2</sub>/MMBtu actual heat input

Applicable Compliance Method -

Compliance shall be demonstrated by the recordkeeping requirements in section A.III. 1 and 2.

If testing is required to demonstrate compliance with the allowable emission limitation of 1.6 lbs SO<sub>2</sub>/MMBtu of actual heat input, the testing shall be conducted using the following method:  
40 CFR Part 60, Appendix A, Method 6.

When firing natural gas, compliance with this limitation will be assumed due to the negligible concentration of sulfur, by weight, in the fuel.

## 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**

Wickes boiler #3, 100 MMBtu/hr  
natural gas or No. 2 fuel oil.

**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:** Vehicular traffic (F002)  
**Activity Description:** Plant-wide Vehicular Traffic

**A. State and Federally Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Roadways and parking areas, approximately 6.6 miles of paved and unpaved roadways and 565,195 sq. ft. of paved and unpaved parking areas used by vehicles with 4 to 18 wheels.	OAC rule 3745-17-07(B)(4)	There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.
	OAC rule 3745-17-08(B)(8)	reasonably available control measures (see Sections A.I.2.c., A.I.2.d., A.I.2.e., and A.I.2.i.)
	OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions from any unpaved road or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.
	OAC rule 3745-17-08(B)(2)	reasonably available control measures (see Sections A.I.2.f. through A.I.2.i.)

**2. Additional Terms and Conditions**

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

Paved roadways:  
 Asphalt 1.2 miles

Paved parking areas:	
Permittee's identification	Approx. area (sq. ft.)
A. Asphalt	155,509
B. Asphalt	57,150
C. Asphalt	70,425



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

- 1.b Paved parking areas minimum inspection frequency
  - A. Asphalt Monthly
  - B. Asphalt Monthly
  - C. Asphalt Monthly
- 1.c Unpaved roadways minimum inspection frequency
  - Gravel Daily- During periods of vehicular traffic
  - Dirt Daily- During periods of vehicular traffic
- 1.d Unpaved parking areas minimum inspection frequency
  - F. Gravel Daily- During periods of vehicular traffic
  - G. Gravel Daily- During periods of vehicular traffic
- 1.e The purpose of the inspections is to determine the need for implementing the control measures specified in section A.I.2. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- 1.f The permittee may, upon receipt of written approval from the Canton local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations.
- 2. The permittee shall maintain records of the following information:
  - 2.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;
  - 2.b the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - 2.c the dates the control measures were implemented; and
  - 2.d on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.
- 3. The information required in 2.d., above, shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

### IV. Reporting Requirements

- 1.a The permittee shall submit deviation (excursion) reports that identify 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
- 1.b The permittee shall submit deviation (excursion) reports that identify each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
- 1.c All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

## **V. Testing Requirements**

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

**1.a** Emissions Limitation:

There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 22 of 40 CFR Part 60, Appendix A, and the modifications listed in paragraph (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03. The visible emission limitation applies to each separate road segment and/or parking area identified in section A.I.2.

**1.b** Emissions Limitation:

There shall be no visible particulate emissions from any unpaved road or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance:

Compliance shall be demonstrated using USEPA Method 22 of 40 CFR Part 60, Appendix A. The visible emission limitation applies to each separate road segment and/or parking area identified in section A.I.2.

Emission Limitation:

There shall be no visible particulate emissions from any unpaved road or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance shall be demonstrated using USEPA Method 22 of 40 CFR Part 60, Appendix A.. The visible emission limitation applies to each separate road segment and/or parking area identified in section A.I.2.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Roadways and parking areas, approximately 16 miles of paved and unpaved roadways and 19 acres of paved and unpaved parking areas used by vehicles with 4 to 18 wheels.		

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

1. If there are no deviations during a calendar quarter that must be reported pursuant to section A.IV. of this permit, the permittee shall submit a quarterly report, in accordance with paragraph B.8 of the General Terms and Conditions, which states that no deviations occurred during that quarter.

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #1 HAP pickle baths (P004)

**Activity Description:** #1 Hot Anneal & Pickling Line Pickling Tanks #1, #2, & #3

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Hot Anneal & Pickle Line pickling tanks #1,#2,#3 w/ scrubber.	OAC rule 3745-17-11	Emissions of particulate matter (including acid fume) shall not exceed 4.70 lbs/hr. (See A.1.2.a.)
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

##### 2. Additional Terms and Conditions

- 2.a Particulate emissions shall be measured at the stack serving this emissions unit.

##### II. Operational Restrictions

1. The scrubber water supply pressure (psig) shall be continuously maintained, at all times while the emissions unit is in operation, at a value not less than the value established during a compliance test or recommended by the scrubber manufacturer.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than 225 gallons per minute at all times while the emissions unit is in operation.

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

1. The permittee shall perform quarterly inspections, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit under the worst case operating conditions. Visible emissions shall be read by a certified VE reader using USEPA Method 9. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - 1.a the color of the emissions;
  - 1.b the percent opacity of the particulate emissions;

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

- 1.c if the emissions exceed the allowable opacity limitations, the cause of the abnormal emissions, if able to be ascertained;
- 1.d the total duration of any visible emission incident exceeding the allowable opacity limitations; and
- 1.e any corrective actions taken to eliminate or minimize the visible emissions to below the allowable opacity limitations.
- 2. The permittee shall properly install, operate and maintain equipment to monitor and record the water supply pressure and the water flow rate while the emissions unit is in operation. The monitoring devices and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each week:

- 2.a the water supply pressure, in psig, on a weekly basis;
- 2.b the water flow rate, in gpm, on a weekly basis; and
- 2.c a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

### IV. Reporting Requirements

- 1. The permittee shall submit semiannual written reports that identify all days during which the visible particulate emissions exceeded the allowable opacity limitations. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - 2.a the water supply pressure; and
  - 2.b the scrubber water flow rate.

### V. Testing Requirements

- 1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
Opacity shall not exceed 20%  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated using USEPA Method 9 pursuant to OAC rule 3745-17-03 (B)(1).
  - 1.b Emission Limitation  
  
4.70 lbs/hr of particulate (including acid fumes) emissions.  
  
Applicable Compliance Method  
  
40 CFR Part 60, Appendix A, Methods 1 - 5 and procedures specified in OAC 3745 -17-03(B)(1)
- 2. Emission Testing Requirements -  
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

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

- 2.a** The emission testing shall be conducted within 6 months of issuance of this permit.
- 2.b** The emission testing shall be conducted to demonstrate compliance with the allowable mass particulate emission rate expressed in Section A.I.1.
- 2.c** The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates, 40 CFR Part 60, Appendix A, Methods 1 - 5 and the procedures specified in OAC 3745 - 17 - 03(B)(1).
- 2.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 Canton local air agency.
- 2.e** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton local air agency's refusal to accept the results of the emission test(s).
- 2.f** Personnel from the Canton 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.
- 2.g** 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 Canton local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Canton local air agency.

## **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**

#1 Hot Anneal & Pickle Line pickling tanks #1,#2,#3 w/ scrubber.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #2 HAP pickle baths (P005)

**Activity Description:** #2 Hot Anneal & Pickling Line Pickling Tanks #1, #2, & #3

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickle Line, Pickling Tanks #1, #2, #3 equipped with dedicated wet scrubber.	OAC rule 3745-17-11	Emissions of particulate matter (including acid fume) shall not exceed 4.70 lbs/hr. (See A.1.2.a.)
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

##### 2. Additional Terms and Conditions

- 2.a Particulate emissions shall be measured at the stack serving this emissions unit.

##### II. Operational Restrictions

1. The scrubber water supply pressure (psig) shall be continuously maintained, at all times while the emissions unit is in operation, at a value not less than the value established during a compliance test or recommended by the scrubber manufacturer.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than 225 gallons per minute at all times while the emissions unit is in operation.

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

1. The permittee shall perform quarterly inspections, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. Visible emissions shall be read by a certified VE reader using USEPA Method 9. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - 1.a the color of the emissions;
  - 1.b the percent opacity of the particulate emissions;

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

- 1.c if the emissions exceed the allowable opacity limitations, the cause of the abnormal emissions, if able to be ascertained;
- 1.d the total duration of any visible emission incident; exceeding the allowable opacity limitations; and
- 1.e any corrective actions taken to eliminate or minimize the visible emissions to below the allowable opacity limitations.
- 2. The permittee shall properly install, operate and maintain equipment to monitor and record the water supply pressure and the water flow rate while the emissions unit is in operation. The monitoring devices and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each week:

- 2.a the water supply pressure, in psig, on a weekly basis;
- 2.b the water flow rate, in gpm, on a weekly basis; and
- 2.c a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

### IV. Reporting Requirements

- 1. The permittee shall submit semiannual written reports that identify all days during which the visible particulate emissions exceeded the allowable opacity limitations. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - 2.a the water supply pressure; and
  - 2.b the scrubber water flow rate.

### V. Testing Requirements

- 1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
Opacity shall not exceed 20%  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated using USEPA Method 9 pursuant to OAC rule 3745-17-03 (B)(1).
  - 1.b Emission Limitation  
  
4.70 lbs/hr of particulate (including acid fumes) emissions.  
  
Applicable Compliance Method  
  
40 CFR Part 60, Appendix A, Methods 1 - 5 and procedures specified in OAC 3745 -17-03(B)(1)
- 2. Emission Testing Requirements -  
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

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

- 2.a** The emission testing shall be conducted within 6 months of issuance of this permit.
- 2.b** The emission testing shall be conducted to demonstrate compliance with the allowable mass particulate emission rate expressed in Section A.I.1.
- 2.c** The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates, 40 CFR Part 60, Appendix A, Methods 1 - 5 and the procedures specified in OAC 3745 - 17 - 03(B)(1).
- 2.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 Canton local air agency.
- 2.e** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton local air agency's refusal to accept the results of the emission test(s).
- 2.f** Personnel from the Canton 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.
- 2.g** 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 Canton local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Canton local air agency.

## **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 Hot Anneal & Pickle Line,  
Pickling Tanks #1, #2, #3 equipped  
with dedicated wet scrubber.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #1 CAP - Preheat anneal furnace (P006)  
**Activity Description:** #1 Cold Anneal & Pickling Line Preheat Furnace

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Cold Anneal & Pickling line preheat furnace, 36 MMBtu/hr heat input, natural gas fired.	OAC rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC rule 3745-17-07	See A.I.2.b.

##### 2. Additional Terms and Conditions

- The steel in #1 Cold Anneal & Pickle preheat furnace (P006) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

##### II. Operational Restrictions

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

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

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

##### IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- All deviation (excursion) reports shall be submitted to the Canton City Health Department, 420 Market Avenue North, Canton, Ohio 44702-1544.

##### V. Testing Requirements

None

##### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

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

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

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

**Applicable Rules/  
Requirements**

**Applicable Emissions  
Limitations/Control  
Measures**

#1 Cold Anneal & Pickling line  
preheat furnace, 36 MMBtu/hr  
heat input, natural gas fired.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #2 HAP - 8 head shot blaster (P009)  
**Activity Description:** #2 Hot Anneal & Pickling Line Wheelabrator Shotblaster

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickle Line, 8 head shot blaster and baghouse (Wheelabrator)	OAC rule 3745-17-11	20.1 lbs/hr of particulates (baghouse stack) See A.I.2.a.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

##### 2. Additional Terms and Conditions

- 2.a Particulate emissions shall be measured at the stack serving this emissions unit.

##### II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained with the range of 1.0 to 7.0 inches of water while the emissions unit is in operation.

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

- The permittee shall properly install, 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 operations manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

##### IV. Reporting Requirements

- The permittee shall submit deviation reports in accordance with Part I - General Terms and Conditions, Section A.I.c.
- The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1.

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

- 3.** All deviation (excursion) reports shall be submitted to the Canton City Health Department, 420 Market Avenue North, Canton, Ohio 44702-1544.

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

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

- 1.a** Emission Limitation:

20.1 lbs/hr particulate emissions.

Applicable Compliance Method:

Methods 1 through 5 of 40 CFR Part 60, Appendix A.

- 1.b** Emission Limitation:

20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

- 2.** The permittee shall conduct, or have conducted, baghouse stack emission testing for this emissions unit in accordance with the following requirements:
  - 2.a** The emission testing shall be conducted within 6 months following issuance of this permit and include uncontrolled particulate tests at the baghouse inlet.
  - 2.b** The emission testing shall be conducted to determine the uncontrolled mass rate of emission from the shot blaster for the purpose of applying curve P-1 of Figure II in OAC Rule 3745-17-11.
  - 2.c** Pressure drop readings shall be recorded during the emissions test to establish an acceptable range of operation.
  - 2.d** The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate, 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03 (B)(10). Opacity limits will be proven by use of EPA Method 9 and OAC rule 3745-17-03 (B)(1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - 2.e** The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test shall be conducted while pickling the most difficult material and the shot blast unit is in operation.

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

- 3.** Personnel from the Canton 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 Canton local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Canton local air agency.

Facility Name: **J & L Specialty Steel, Inc.**  
Facility ID: **15-76-00-0378**  
Emissions Unit: **#2 HAP - 8 head shot blaster (P009)**

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#2 Hot Anneal & Pickle Line, 8 head  
shot blaster and baghouse  
(Wheelabrator)

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #2 HAP - Equalizer anneal furnace (P010)  
**Activity Description:** #2 Hot Anneal & Pickling Line Equalizing Furnace

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickle Equalizer anneal furnace, 37 MMBtu/hr heat input, natural gas fired.	OAC rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC rule 3745-17-07	See A.I.2.b.

##### 2. Additional Terms and Conditions

- The steel in #2 Hot Anneal & Pickling Equalizer anneal furnace (P010) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

##### II. Operational Restrictions

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

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

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

##### IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

##### V. Testing Requirements

None

##### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

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

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

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

**Applicable Rules/  
Requirements**

**Applicable Emissions  
Limitations/Control  
Measures**

#2 Hot Anneal & Pickle Equalizer anneal furnace, 37 MMBtu/hr heat input, natural gas fired.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #2 HAP - Preheat anneal furnace (P011)  
**Activity Description:** #2 Hot Anneal & Pickling Line Preheat Furnace

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Hot Anneal & Pickling preheat anneal furnace, 25.4 MMBtu/hr heat input, natural gas fired.	OAC rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC rule 3745-17-07	See A.I.2.b.

##### 2. Additional Terms and Conditions

- The steel in #2 Hot Anneal & Pickling preheat anneal furnace (P011) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

##### II. Operational Restrictions

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

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

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

##### IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

##### V. Testing Requirements

None

##### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#2 Hot Anneal & Pickling preheat anneal furnace, 25.4 MMBtu/hr heat input, natural gas fired.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #1 HAP - Equalizer anneal furnace (P012)  
**Activity Description:** #1 Hot Anneal & Pickling Line Equalizing Furnace

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Hot Anneal & Pickle Equalizer Anneal furnace, 22.4 MMBtu/hr heat input, natural gas fired.	OAC rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC rule 3745-17-07	See A.I.2.b.

##### 2. Additional Terms and Conditions

- The steel in #1 Hot Anneal & Pickling Equalizer furnace (P012) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

##### II. Operational Restrictions

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

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

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

##### IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

##### V. Testing Requirements

None

##### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#1 Hot Anneal & Pickle Equalizer  
Anneal furnace, 22.4 MMBtu/hr heat  
input, natural gas fired.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #1 HAP - Preheat anneal furnace (P013)  
**Activity Description:** #1 Hot Anneal & Pickling Line Preheat Furnace

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Hot Anneal & Pickle preheat furnace, 38.4 MMBtu/hr heat input, natural gas fired.	OAC rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC rule 3745-17-07	See A.I.2.b.

##### 2. Additional Terms and Conditions

- The steel in #1 Hot Anneal & Pickling preheat furnace (P013) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

##### II. Operational Restrictions

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

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

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

##### IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

##### V. Testing Requirements

None

##### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#1 Hot Anneal & Pickle preheat furnace, 38.4 MMBtu/hr heat input, natural gas fired.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #2 CAP - Preheat #1 anneal furnace (P017)  
**Activity Description:** #2 Cold Anneal & Pickling Line Preheat Furnace #1

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Cold Anneal & Pickle #1 anneal furnace, 25.68 MMBtu/hr heat input, natural gas fired.	OAC rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC rule 3745-17-07	See A.I.2.b.

##### 2. Additional Terms and Conditions

- The steel in #2 Cold Anneal & Pickle #1 Anneal furnace (P017) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

##### II. Operational Restrictions

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

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

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

##### IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

##### V. Testing Requirements

None

##### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

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

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

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

**Applicable Rules/  
Requirements**

**Applicable Emissions  
Limitations/Control  
Measures**

#2 Cold Anneal & Pickle #1 anneal furnace, 25.68 MMBtu/hr heat input, natural gas fired.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #2 CAP - Preheat #2 anneal furnace (P018)  
**Activity Description:** #2 Cold Anneal & Pickling Line Preheat Furnace #2

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Cold Anneal & Pickle #2 anneal furnace, 28.4 MMBtu/hr heat input, natural gas fired.	OAC rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC rule 3745-17-07	See A.I.2.b.

##### 2. Additional Terms and Conditions

- The steel in #2 Cold Anneal furnace (P018) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

##### II. Operational Restrictions

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

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

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

##### IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

##### V. Testing Requirements

None

##### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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#2 Cold Anneal & Pickle #2 anneal furnace, 28.4 MMBtu/hr heat input, natural gas fired.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #2 CAP - pickling baths (P019)  
**Activity Description:** #2 Cold Anneal & Pickling Line Pickling Tanks #1, #2, & #3

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Cold Anneal & Pickle Baths #1, #2, #3; w/wet scrubber.	OAC rule 3745-17-11	Emissions of particulate matter (including acid fume) shall not exceed 1.53 lbs/hr. (See A.1.2.a.)
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

##### 2. Additional Terms and Conditions

- 2.a Particulate emissions shall be measured at the stack serving this emissions unit.

##### II. Operational Restrictions

1. The scrubber water supply pressure (psig) shall be continuously maintained, at all times while the emissions unit is in operation, at a value not less than the value established during a compliance test or recommended by the scrubber manufacturer.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than 225 gallons per minute at all times while the emissions unit is in operation.

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

1. The permittee shall perform quarterly inspections, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. Visible emissions shall be read by a certified VE reader using USEPA Method 9. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - 1.a the color of the emissions;
  - 1.b the percent opacity of the particulate emissions;

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

- 1.c** if the emissions exceed the allowable opacity limitations, the cause of the abnormal emissions, if able to ascertain;
- 1.d** the total duration of any visible emission incident exceeding the allowable opacity limitations, and
- 1.e** any corrective actions taken to eliminate or minimize the visible emissions to levels below the allowable opacity limitations.
- 2.** The permittee shall properly install, operate and maintain equipment to monitor and record the water supply pressure and the water flow rate while the emissions unit is in operation. The monitoring devices and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each week:

- 2.a** the water supply pressure, in psig, on a weekly basis;
- 2.b** the water flow rate, in gpm, on a daily weekly; and
- 2.c** a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

### **IV. Reporting Requirements**

- 1.** The permittee shall submit semiannual written reports that identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and exceeded the allowable opacity limitations. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
- 2.** The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels.
  - 2.a** the water supply pressure; and
  - 2.b** the scrubber water flow rate.

### **V. Testing Requirements**

- 1.** Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a** Emission Limitation:  
  
Opacity shall not exceed 20%  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated using USEPA Method 9 pursuant to OAC rule 3745-17-03 (B)(1).
  - 1.b** Emission Limitation  
  
1.53 lbs/hr of particulate (including acid fumes) emissions.  
  
Applicable Compliance Method  
  
40 CFR Part 60, Appendix A, Methods 1 - 5 and procedures specified in OAC 3745 -17-03(B)(1)
- 2.** Emission Testing Requirements -  
The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

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

- 2.a** The emission testing shall be conducted within 6 months of issuance of this permit.
- 2.b** The emission testing shall be conducted to demonstrate compliance with the allowable mass particulate emission rate expressed in Section A.I.1. Alternative U. S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- 2.c** The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for particulates, 40 CFR Part 60, Appendix A, Methods 1 - 5 and the procedures specified in OAC 3745 - 17 - 03(B)(1).
- 2.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 Canton local air agency.
- 2.e** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Canton local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Canton local air agency's refusal to accept the results of the emission test(s).
- 2.f** Personnel from the Canton 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.
- 2.g** 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 Canton local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Canton local air agency.

## **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 Cold Anneal & Pickle Baths #1,  
#2, #3; w/wet scrubber.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #2 CAP - Equalizer anneal furnace (P024)

**Activity Description:** #2 Cold Anneal & Pickling Line Equalizing Furnace

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#2 Cold Anneal & Pickle Equalizer Anneal Furnace, 12.22 MMBtu/hr heat input, natural gas fired.	OAC rule 3745-17-11	No applicable limit See A.I.2.a.
	OAC rule 3745-17-07	See A.I.2.b.

##### 2. Additional Terms and Conditions

- The steel treated in the preheat furnace (P024) does not contribute to particulate emissions and no process weight rate can be determined; therefore, no particulate emission limit is imposed on this emissions unit.
- Visible particulate limitations do not apply to this emissions unit per OAC rule 3745-17-07 (A)(3)(h).

##### II. Operational Restrictions

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

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

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

##### IV. Reporting Requirements

- The permittee shall submit deviation (excursion) reports that identify each day a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

##### V. Testing Requirements

None

##### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

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

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

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

**Applicable Rules/  
Requirements**

**Applicable Emissions  
Limitations/Control  
Measures**

#2 Cold Anneal & Pickle Equalizer  
Anneal Furnace, 12.22 MMBtu/hr  
heat input, natural gas fired.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** #1 HAP - 4 head shot blaster (P025)  
**Activity Description:** #1 Hot Anneal & Pickling Line Pangborn Shotblaster

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Hot Anneal & Pickle Line, 4 head shot blaster and primary baghouse (Pangborn Model 240 HP-1015-TS-825)	OAC rule 3745-17-11	4.09 lbs/hr of particulates (baghouse stack) See A.I.2.a. and A.I.2.b.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for a period of six consecutive minutes in any sixty minutes. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

##### 2. Additional Terms and Conditions

- More restrictive particulate limit exists in B.I.1., State Enforceable Section, 1.71 lbs/hr particulate matter.
- Particulate emissions to be measured at stack serving this emissions unit.

##### II. Operational Restrictions

- The pressure drop across the baghouse shall be maintained with the range of 1.0 to 7.0 inches of water while the emissions unit is in operation.

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

- The permittee shall properly install, 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 operations manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

##### IV. Reporting Requirements

- The permittee shall submit deviation reports in accordance with Part I - General Terms and Conditions, Section A.I.c.

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

- 2.** The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in Section A.II.1.
- 3.** All deviation (excursion) reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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

- 1.** Compliance with the emissions in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a** Emission Limitation:  
  
4.09 lbs/hr particulate emissions.  
  
Applicable Compliance Method:  
  
Methods 1 through 5 of 40 CFR Part 60, Appendix A.
  - 1.b** Emission Limitation:  
  
20 percent opacity, as a 6-minute average, except as provided by rule.  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).
- 2.** The permittee shall conduct, or have conducted, baghouse stack emission testing for this emissions unit in accordance with the following requirements:
  - 2.a** The emission testing shall be conducted within 6 months following issuance of this permit and include uncontrolled particulate tests at the baghouse inlet.
  - 2.b** The emission testing shall be conducted to determine the uncontrolled mass rate of emission from the shot blaster for the purpose of applying curve P-1 of Figure II in OAC Rule 3745-17-11.
  - 2.c** Pressure drop readings shall be recorded during the emissions test to establish an acceptable range of operation.
  - 2.d** The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate, 40 CFR Part 60, Appendix A, Methods 1-5 and the procedures specified in OAC rule 3745-17-03 (B)(10). Opacity limits will be proven by use of EPA Method 9 and OAC rule 3745-17-03 (B)(1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - 2.e** The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The test shall be conducted while pickling the most difficult material.

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

**V. Testing Requirements (continued)**

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

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
#1 Hot Anneal & Pickle Line, 4 head shot blaster and primary baghouse (Pangborn Model 240 HP-1015-TS-825)	OAC rule 3745-31-05 PTI #15-506	1.71 lbs/hr particulates

**2. Additional Terms and Conditions**

- 2.a The baghouse removal efficiency shall not be less than 99% per PTI #15-506.

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):
  - 1.a Emission Limitation:  
1.71 lbs/hr of particulate matter, 99% collection efficiency.  
  
Applicable Compliance Method:  
See Part A.V.1.a., Testing Requirements.

**VI. Miscellaneous Requirements**

None

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