



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

02/27/02

**RE: Proposed Title V Chapter 3745-77 Permit  
15-76-00-0613  
The Timken Company - Steel Plants**

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 The Timken Company - Steel Plants, has been created in Ohio EPA's State Air Resources System (STARS) on 02/27/02, 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 receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by 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  
File, DAPC PMU



State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 02/27/02

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 15-76-00-0613 to:
The Timken Company - Steel Plants
1835 Dueber Avenue, S.W.
Canton, OH 44706

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units like F201, K206, K207, P222, P234, P258, P259, P264, P271, P272, P282, P284, P285, P286, P287, P288, P289, P292, Z201, and Z202.

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.

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

Christopher Jones
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

#### 1. Monitoring and Related Record Keeping 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
- 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
- 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 record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*
  - 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 record keeping 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 (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of 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.  
*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, 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, record keeping, 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.  
*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*
- 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

## 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 condition, of any emissions unit(s) 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 upset conditions.

Except as provided in OAC rule 3745-15-06, 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).

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))*

## 3. **Risk Management Plans**

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

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## 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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

## 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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

## 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, in accordance with A.10 below. 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.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

## 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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## 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.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**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 (18) 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.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**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.

*(Authority for term: OAC rule 3745-77-07(B))*

**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 Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the 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.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**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.

*(Authority for term: OAC rule 3745-77-07(F))*

**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).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**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.

*(Authority for term: OAC rule 3745-77-07(G))*

**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 of the U.S. EPA, 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 purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

*(Authority for term: OAC rule 3745-77-07(I))*

**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.

*(This term is provided for informational purposes only.)*

**18. Insignificant Activities**

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

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**19. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping 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.)

**2. Records Retention Requirements**

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

**3. Inspections and Information Requests**

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

**4. 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).

**5. 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.

**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**

1. This Title V permit now incorporates emissions units which were originally part of three separately permitted facilities. The operations at the Gambrinus Steel Plant (originally identified as Ohio EPA premise number 1576000613) have been combined with the operations at the Faircrest Steel Plant (originally identified as Ohio EPA premise number 1576001246) and the Harrison Steel Plant (originally identified as Ohio EPA premise number 1576050614) to form this Title V facility (now collectively identified as premise number 1576000613) pursuant to OAC rule 3745-77-01(Q). The emissions units identification numbers for the operations at the Faircrest Steel and the Harrison Steel Plants have been changed to avoid duplicating those emissions units identification numbers already in use. The original emissions units identification numbers are specified in parentheses, where appropriate.
2. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

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

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

P221 - ingot stripping area (formerly P021);  
P251 - solvent washer (formerly P051);  
P263 - Herzog grinders (formerly P063);  
Z203 - parts washers;  
Z204 - painting operations;  
Z205 - alloy conveyor;  
Z206 - lance skulls;  
Z207 - annex station;  
Z208 - slag rake;  
Z209 - refractory sprays and dryers; and  
Z210 - hot saws.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

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

**Emissions Unit ID:** Roadways and Parking Areas (F201)  
**Activity Description:** Roadways and parking areas

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paved roadways and paved and unpaved parking areas used by vehicles with 4 to 18 wheels  (formerly F001)	OAC rule 3745-17-07(B)(4)	There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed 6 minutes during any 60-minute observation period.
	OAC rule 3745-17-08(B)(8)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.c, A.2.d, and A.2.f through A.2.j)
	OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed 13 minutes during any 60-minute observation period.
	OAC rule 3745-17-08(B)(2)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.2.e through A.2.j)

##### 2. Additional Terms and Conditions

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

paved roadways:

all asphalt or chip and seal road segments

paved parking areas:

all asphalt or chip and seal parking areas

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

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

unpaved roadways:

none

unpaved parking areas:

all gravel parking areas

- 2.c** The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by flushing with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.d** The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved shoulders of all paved roadways with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.f** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.g** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.h** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.i** Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.j** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

## **II. Operational Restrictions**

**None**

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

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

paved roadways:		minimum inspection frequency:
all asphalt or chip and seal road segments		weekly
paved parking areas		minimum inspection frequency
all asphalt or chip and seal parking areas		weekly
unpaved parking areas		minimum inspection frequency
all gravel parking areas		weekly
2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the Canton City Health Department, Air Pollution Control Division modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to minimize or eliminate visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitations.
4. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

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

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

**IV. Reporting Requirements (continued)**

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

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paved roadways and paved and unpaved parking areas used by vehicles with 4 to 18 wheels  (formerly F001)	OAC rule 3745-17-07(B)(8)(a)	There shall be no visible fugitive particulate emissions from any paved roadway or parking area greater than 10% opacity.  See B.I.2.a below.
	OAC rule 3745-17-07(B)(8)(a)	There shall be no visible fugitive particulate emissions from any unpaved roadway or parking area greater than 10% opacity.  See B.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a This emission limitation will become federally enforceable upon incorporation into the State Implementation Plan (SIP).

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

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

**1.a Emission Limitation:**

There shall be no visible particulate emissions from any paved roadway or parking area greater than 10% opacity as determined by the compliance method below.

Applicable Compliance Method:

Compliance shall be demonstrated using the procedures specified in 40 CFR Part 60, Appendix A, Method 9, and the modifications listed in OAC rule 3745-17-03(B)(3)(d). The visible emission limitation applies to each separate road segment and/or parking area identified in section B.I.2, and the emission test shall be performed for the representative road or parking area for each segment.

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

There shall be no visible particulate emissions from any unpaved road or parking area greater than 10% opacity as determined by the compliance method below.

Applicable Compliance Method:

Compliance shall be demonstrated using the procedures specified in 40 CFR Part 60, Appendix A, Method 9, and the modifications listed in OAC rule 3745-17-03(B)(3)(d). The visible emission limitation applies to each separate road segment and/or parking area identified in section B.1.2, and the emission test shall be performed for the representative road or parking area for each segment.

**VI. Miscellaneous Requirements**

**None**

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

**Emissions Unit ID:** Elkem Inspection Unit (K206)

**Activity Description:** Identifies and marks defects in steel

#### 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>
Elkem inspection unit - identifies and marks defects in steel with spray paint; unit is equipped with over-spray filters; paint is applied at ambient temperature with no drying oven  (formerly K006)	OAC rule 3745-31-05(A)(3) (PTI 15-0849)	0.21 lb/hr of particulate emissions
		0.94 tpy of particulate emissions
		146 lbs/day of organic compounds (OC)
		26.6 tpy of OC
		See A.II.1 below.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	See A.I.2.a below.
	OAC rule 3745-21-09(U)	Exempt, see A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a The particulate emission limitation required by OAC rule 3745-17-11 is less stringent than the particulate emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.
- 2.b The coating usage restriction required in OAC rule 3745-21-09(U)(2)(e)(iii) to qualify for an exemption from the requirements of OAC rule 3745-21-09(U)(1) is equivalent to the coating usage restriction established by the best available technology requirement specified in OAC rule 3745-31-05(A)(3).

##### II. Operational Restrictions

1. The permittee shall not employ more than 10 gallons of coating material per day and not more than 10 gallons of cleanup material per day in this emissions unit.

## **II. Operational Restrictions (continued)**

2. The permittee shall not employ any photochemically reactive materials in this emissions unit nor shall they be employed for purging or cleanup operations.
3. The permittee shall employ the overspray filter system whenever this emissions unit is in operation. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendation in order to maintain the highest effective level of particulate emissions control. Filters shall be changed if visible emissions occur.

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

1. The permittee shall collect and record the following information each day for the emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed;
  - d. the OC content of each coating, as applied, in pounds per gallon;
  - e. the total OC emissions from all coatings employed, in pounds per day;
  - f. the name and identification of each cleanup material employed;
  - g. the number of gallons of each cleanup material employed;
  - h. the OC content of each cleanup material, in pounds per gallon;
  - i. the total volume, in gallons, of all of the cleanup materials employed; and
  - j. the total OC emissions from all coatings and cleanup materials employed, in pounds or tons.
2. The permittee shall collect and record the following information for this emissions unit:
  - a. whether or not the overspray filter system was in service on each day the emissions unit was in operation; and
  - b. the date of filter changes.

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 146 lbs/day, and the actual OC emissions for each such day.
2. The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating and/or cleanup usage limits. The notification shall include a copy of such record and shall be sent to the Canton City Health Department, Air Pollution Control Division within 45 days after the exceedance occurs.
3. The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing of any record showing that the overspray filter system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Canton City Health Department, Air Pollution Control Division within 30 days after the event occurs.
4. The permittee shall also submit annual reports that specify the total OC and particulate emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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

6. All reports shall be sent 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 emission limitations and operational restriction in sections A.I.1 and A.II.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

0.21 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation may be used:

$E$  = particulate matter emissions rate (lb/hr).

$E$  = maximum coating solids content usage rate (in pounds per hour) X (1-TE) X (1-CE).

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the metal part to the amount of coating solids used.

CE = control efficiency of the dry exhaust filtration system.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

- 1.b Emission Limitation:

0.94 tpy of particulate emissions

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable particulate emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly particulate emission limitation.

- 1.c Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

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

**V. Testing Requirements (continued)**

**1.d** Emission Limitation:

146 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of any coatings or cleanup material employed.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

**1.e** Emission Limitation:

26.6 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of any coatings or cleanup material employed.

**1.f** Operational Restriction:

The permittee shall not employ more than 10 gallons of coating material per day and not more than 10 gallons of cleanup material per day in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

**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>
---	---	--

**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:** Krautkramer Inspection Unit (K207)  
**Activity Description:** Identifies and marks defects in steel

**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>
Krautkramer Branson internal bar and billet inspection unit paint marking station which detects and marks internal flaws in metal  (formerly K007)	OAC rule 3745-31-05(A)(3) (PTI 15-0849)	14.6 lbs/day of organic compounds (OC)  2.66 tpy of OC  See A.II.1 below.
	OAC rule 3745-21-09(U)	Exempt, see A.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a The coating usage restriction required in OAC rule 3745-21-09(U)(2)(e)(iii) to qualify for an exemption from the requirements of OAC rule 3745-21-09(U)(1) is less stringent than the coating usage restriction established by the best available technology requirement specified in OAC rule 3745-31-05(A)(3).

**II. Operational Restrictions**

1. The permittee shall not employ more than 1 gallon of coating material per day and not more than 1 gallon of cleanup material per day in this emissions unit.
2. The permittee shall not employ any photochemically reactive materials in this emissions unit nor shall they be employed for purging or cleanup operations.

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

1. The permittee shall collect and record the following information each day for the emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the volume, in gallons, of each coating employed;
  - c. the total volume, in gallons, of all of the coatings employed;
  - d. the OC content of each coating, as applied, in pounds per gallon;
  - e. the total OC emissions from all coatings employed, in pounds per day;
  - f. the name and identification of each cleanup material employed;
  - g. the number of gallons of each cleanup material employed;
  - h. the total volume, in gallons, of all of the cleanup materials employed;
  - i. the OC content of each cleanup material, in pounds per gallon;
  - j. the total OC emissions from all coatings and cleanup materials employed, in pounds or tons; and
  - k. whether or not each coating and cleanup material employed is a photochemically reactive material.

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 14.6 lbs/day, and the actual OC emissions for each such day.
2. The permittee shall notify the Canton City Health Department, Air Pollution Control Division in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating and/or cleanup usage limits. The notification shall include a copy of such record and shall be sent to the Canton City Health Department, Air Pollution Control Division within 45 days after the exceedance occurs.
3. The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (Canton City Health Department, Air Pollution Control Division) within 30 days of the deviation.
4. The permittee shall also submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
6. All reports shall be sent 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 emission limitations and operational restriction in sections A.I.1 and A.II.1 of these terms and conditions shall be determined in accordance with the following methods:

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

14.6 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of any coatings or cleanup material employed.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

**1.b** Emission Limitation:

2.66 tpy of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of any coatings or cleanup material employed.

**1.c** Operational Restriction:

The permittee shall not employ more than 1 gallon of coating material per day and not more than 1 gallon of cleanup material per day in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

**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>
---	---	--

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

## Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Continuous Caster (P222)

**Activity Description:** Continually casts steel

### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
continuous caster controlled with baghouse #5  (formerly P022)	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745-17-11(B)	See A.I.2.a below.

#### 2. Additional Terms and Conditions

- 2.a The visible particulate emission limitations and the particulate emission limitation required by OAC rule 3745-17-07(A) and OAC rule 3745-17-11, respectively, are less stringent than the visible particulate emission limitation and the particulate emission limitation established in 40 CFR Part 60, Subpart AA. Although 40 CFR Part 60, Subpart AA is not an applicable rule for emissions unit P222, the emissions from this emissions unit are combined with other emissions from the facility and are vented to a common baghouse.

Emissions units P222, P258, P259, P288, P289, Z201, and Z202 are all vented to baghouse #5, and, as such, must not emit more than 3.0% opacity or more than 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases (gr/dscf) from the baghouse stack in accordance with 40 CFR Part 60, Subpart AA.

### II. Operational Restrictions

1. The pressure drop across baghouse #5 shall be maintained between the range of 3.0 to 8.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.

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

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

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1., as well as the corrective actions that were taken to bring the pressure drop back into the allowable range.

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

2. The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702-1544.

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

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
3% opacity as a 6-minute average  
  
Applicable Compliance Method:  
  
If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 9.
  - 1.b Emission Limitation:  
  
0.0052 gr/dscf of particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months of issuance of this permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The following parameters, at a minimum, shall be monitored and recorded during the emission testing: the process weight rate (in tons) and the pressure drop across the baghouse.
  - e. The test(s) shall be conducted while emissions units P222, P258, P259, P288, P289, Z201, and Z202 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The isolation butterfly damper in the main air duct shall be in the closed position during each emission test.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the 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).

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 containing the results of the emission 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 of the 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

## Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** #5 Isothermal Pit (P234)

**Activity Description:** Heats steel

### 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>
# 8 isothermal pit - natural gas-fired with a maximum capacity of 15.7 mmBtu/hr of actual heat input  (formerly P034)	OAC 3745 rule -17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.b and A.I.2.c below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.d below.

#### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.b The permittee shall minimize or eliminate visible particulate fugitive emissions through the employment of reasonably available control measures (RACM), i.e., the firing of natural gas as fuel. No additional controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials employed in this emissions unit do not generate particulate emissions during the heating process.
- 2.c If the permittee can demonstrate compliance with the visible emission limitation contained in section A.I.2.a above, the employment of the permittee's RACM, in accordance with the requirements of section A.I.2.b, will be deemed adequate.
- 2.d Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 50.6 pounds per hour.

### II. Operational Restrictions

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

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

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

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs

## **V. Testing Requirements**

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

**1.a** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

Compliance shall be demonstrated, if required, based upon visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions shall include all non-stack egress points from the building housing this emissions unit. Such egress points shall include, but are not limited to, doorways, windows, and roof monitors.

**1.b** Emission Limitation:

50.6 pounds per hour of SO<sub>2</sub>

Applicable Compliance Method:

The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials employed in this emissions unit do not generate SO<sub>2</sub> emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

## **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>
---	---	--

**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:** #9 EAF (P258)

**Activity Description:** Produces steel product

#### 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>
#9 electric arc furnace - roof control system vented to baghouse #5  (formerly P058)	OAC rule 3745-31-05(A)(3) (PTI 15-049)	See A.I.2.a below.
	OAC rule 3745-17-07(A)	See A.I.2.b below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.b and A.I.2.c below.
	OAC rule 3745-17-11(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	244.68 lbs/hr of sulfur dioxide (SO <sub>2</sub> )
	40 CFR Part 60, Subpart AA	Particulate emissions shall not exceed 0.0052 grain per dry standard cubic foot of exhaust gases (gr/dscf).  Visible particulate emissions shall not exceed 3% opacity as a 6-minute average from the baghouse stacks and shall not exceed 6% opacity as a 6-minute average from the melt shop (due solely to the operation of the affected EAF).  Shop opacities shall not exceed 20% during charging and 40% during tapping operations.  Visible particulate emissions of fugitive dust shall not exceed 10% opacity from the enclosed dust handling equipment.  See A.I.2.d below.

## **2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-08(B) and 3745-18-06(E) and 40 CFR Part 60, Subpart AA.
- 2.b** The emission limitation required by this applicable rule is less stringent than the emission limitation specified in 40 CFR Part 60, Subpart AA.
- 2.c** The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
  - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust; and
  - ii. the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.d** Where the capture system is operated such that the roof of the shop is closed during the charge and the tap, and emissions to the atmosphere are prevented until the roof is opened after completion of the charge or tap, the shop opacity standards shall apply when the roof is open and shall continue to apply for the length of time defined by the charging and/or tapping periods.

## **II. Operational Restrictions**

- 1.** The pressure drop across the baghouse shall be maintained between the range of 3.0 to 8.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.

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

- 1.** The permittee shall properly calibrate, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
- 2.** The permittee shall perform daily visible particulate emission observations of the exhaust from the baghouse and melt shop by a certified visible emission observer as follows:
  - a. The visible emission observations from the baghouse #5 stacks serving this emissions unit shall be conducted daily in accordance with Method 9 of 40 CFR Part 60, Appendix A.
  - b. The visible emission observations shall be conducted at least once per day when this emissions unit is operating in the melting and refining or tapping or charging periods.
  - c. The visible emissions shall be taken for at least three 6-minute periods. The opacities shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of the visible emissions, only one set of three 6-minute observations shall be required. In this case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause or location of visible emissions observed during a single incident.
  - d. The permittee shall maintain copies of all daily opacity observations required above. The records shall identify the persons responsible for conducting the readings and verify that their Method 9 certifications are up-to-date.

## **IV. Reporting Requirements**

- 1.** The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1, as well as the corrective actions that were taken to bring the pressure drop back into the allowable range.

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

- 2.** The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the baghouse stacks, dust handling equipment, building fugitive dust and shop opacity observations were in excess of the limit specified in section A.I.1 of this permit.
- 3.** The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
- 4.** All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

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

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

- 1.a** Emission Limitation:

0.0052 gr/dscf of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

- 1.b** Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

Because the SO<sub>2</sub> emissions emitted from the stack of baghouse #5 are generated by emissions units P258 and P288 combined, compliance shall be demonstrated if the tested SO<sub>2</sub> emission rate is less than the combined limit of 607.18 lbs/hr. If the tested SO<sub>2</sub> emission rate is greater than the combined limit of 607.18 lbs/hr, then each of the emissions units that vent SO<sub>2</sub> emissions to baghouse #5 shall be considered out of compliance.

- 1.c** Emission Limitations:

3% opacity as a 6-minute average from the baghouse stacks

6% opacity as a 6-minute average from the melt shop

20% opacity from the melt shop during charging

40% opacity from the melt shop during tapping

10% opacity from the dust handling equipment

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months after issuance of the permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates and SO<sub>2</sub>.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates, 40 CFR Part 60, Appendix A, Methods 1 through 5 and for SO<sub>2</sub>, 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The following parameters, at a minimum, shall be monitored and recorded during the emission testing: the process weight rate (in tons) and the pressure drop across the baghouse.
  - e. The particulate test(s) shall be conducted while emissions units P222, P258, P259, P288, P289, Z201, and Z202 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The SO<sub>2</sub> test(s) shall be conducted while emissions units P258, P288, and P289 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The isolation butterfly damper in the main air duct shall be in the closed position during each emission test.

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).

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 emission 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 written reports shall include, at a minimum, the information specified in 40 CFR 60.276(c). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**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:** Lime Handling System (P259)  
**Activity Description:** Handles lime

#### 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>
pneumatic lime handling system controlled with a baghouse; melt shop lime system  (formerly P059)	OAC rule 3745-31-05 (PTI 15-072)	See A.I.2.a below.
	OAC rule 3745-17-07(A)(1)	See A.I.2.b below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.c below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.d below.
	OAC rule 3745-17-11(B)	12.0 lbs/hr of particulate emissions See A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-07(B), 3745-17-08(B), and 3745-17-11.
- 2.b The visible particulate emission limitation required by OAC rule 3745-17-07(A) and the particulate emission limitations required by OAC rules 3745-17-08(B) and 3745-17-11 are less stringent than the visible particulate emission limitation and the particulate emission limitation established in 40 CFR Part 60, Subpart AA. Although 40 CFR Part 60, Subpart AA is not an applicable rule for emissions unit P259, the emissions from this emissions unit are combined with other emissions from the facility and are vented to a common baghouse.

Emissions units P222, P258, P259, P288, P289, Z201, and Z202 are all vented to baghouse #5, and, as such, must not emit more than 3.0% opacity or more than 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases (gr/dscf) from the baghouse stack in accordance with 40 CFR Part 60, Subpart AA.

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

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

**2.d** The permittee shall minimize or eliminate visible particulate fugitive emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:

- i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent and control the fugitive dust; and
- ii. the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

## **II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained between the range of 3.0 to 8.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall properly calibrate, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

## **IV. Reporting Requirements**

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

## **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

0.0052 gr/dscf of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**1.b** Emission Limitation:

3% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**1.c** Emission Limitation:

20% opacity as a 3-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions determination shall include all non-stack egress points from the building housing this emissions unit. Such egress points shall include, but not be limited to, doorways, windows, and roof monitors.

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

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

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

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A and for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The following parameters, at a minimum, shall be monitored and recorded during the emission testing: the process weight rate (in tons) and the pressure drop across the baghouse.

e. The test(s) shall be conducted while emissions units P222, P258, P259, P288, P289, Z201, and Z202 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The isolation butterfly damper in the main air duct shall be in the closed position during each emission test.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the 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).

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 containing the results of the emission 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 of the 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**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:** Ladle Refiner #1 (P264)

**Activity Description:** Refines

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
ladle refiner #1 controlled by hooding vented to the existing baghouse #4  (formerly P064)	OAC rule 3745-31-05(A)(3) (PTI 15-0216)	See A.I.2.a below.
	OAC rule 3745-17-07(A)(1)	See A.I.2.c below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.d below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.b and A.I.2.e below.
	OAC rule 3745-17-11(B)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	457.84 lbs/hr of sulfur dioxide (SO <sub>2</sub> )

##### 2. Additional Terms and Conditions

**2.a** The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-07(B), 3745-17-08(B), and 3745-18-06(E).

**2.b** The particulate emission limitations required by OAC rule 3745-17-08(B) and OAC rule 3745-17-11 are less stringent than the particulate emission limitation established in PTI 15-0575 pursuant to the best available technology requirement specified in OAC rule 3745-31-05(A)(3) for emissions unit P282. Although PTI 15-0575 is not applicable to emissions unit P264, the emissions from this emissions unit are combined with other emissions from the facility and are vented to a common baghouse.

Emissions units P264, P282, and P292 are all vented to baghouse #4, and, as such, must not emit more than 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases (gr/dscf) from the baghouse stack in accordance with PTI 15-0575.

**2.c** Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

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

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

- 2.e** The permittee shall minimize or eliminate visible particulate emissions of fugitive dust through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
- i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust; and
  - ii. the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.

## **II. Operational Restrictions**

1. The pressure drop across baghouse #4 shall be maintained between the range of 4.0 to 8.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall properly calibrate, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

## **IV. Reporting Requirements**

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

## **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

0.0052 gr/dscf of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average for stack emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission 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) at the same time USEPA Method 5 tests are being performed on the baghouse #4 stack.

**1.c** Emission Limitation:

20% opacity as a 3-minute average for fugitive emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions determination shall include all non-stack egress points from the building housing this emissions unit. Such egress points shall include, but not be limited to, doorways, windows, and roof monitors.

**1.d** Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

Because the SO<sub>2</sub> emissions emitted from the stack of baghouse #4 are generated by emissions units P264, P282, and P292, combined, compliance shall be demonstrated if the SO<sub>2</sub> stack test result is less than the combined limit of 709.02 lbs/hr. If the SO<sub>2</sub> stack test result is greater than the combined limit of 709.02 lbs/hr, then each of the emissions units that vent SO<sub>2</sub> emissions to baghouse #4 shall be considered out of compliance.

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

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months after issuance of the permit and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates, visible particulate emissions, and SO<sub>2</sub>.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates, 40 CFR Part 60, Appendix A, Methods 1 through 5, for visible particulate emissions, 40 CFR Part 60, Appendix A, Method 9, and for SO<sub>2</sub>, 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The following parameters, at a minimum, shall be monitored and recorded during the emission testing: the process weight rate (in tons) and the pressure drop across the baghouse.
  - e. The particulate test(s) shall be conducted while emissions units P264, P282, and P292 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The SO<sub>2</sub> test(s) shall be conducted while emissions units P264, P282, and P292 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The isolation butterfly damper in the main air duct shall be in the closed position during each compliance test.

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).

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 emission 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.

## **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>
---	---	--

**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:** Bloom Grinder #1 (P271)

**Activity Description:** Repairs defects in steel

#### 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>
bloom grinder #1 controlled with a Wheelabrator baghouse  formerly (P071)	OAC rule 3745-31-05(A)(3) (PTI 15-0464)	0.68 lb/hr of particulate emissions  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-07(B), and 3745-17-08(B).
		See A.I.2.e below.
	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.c and A.I.2.d below.
	OAC rule 3745-17-11(B)	See A.I.2.d below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
  - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust; and
  - ii. the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.d The emission limitation required by this applicable rule is less stringent than the emission limitation required pursuant to the best available technology requirement specified in OAC rule 3745-31-05(A)(3).
- 2.e The collection efficiency of the baghouse shall not be less than 99.0%.

## **II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained between the range of 4.0 to 7.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall properly calibrate, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly 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.I.1, as well as the corrective actions that were taken to bring the pressure drop back into the allowable range.
2. The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the non-stack egress points serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## **V. Testing Requirements**

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

- 1.a Emission Limitation:

0.68 lb/hr of particulate emissions with a minimum 99% removal efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

## V. Testing Requirements (continued)

### 1.b Emission Limitation:

20% opacity as a 6-minute average for stack emissions

Applicable Compliance Method:

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

### 1.c Emission Limitation:

20% opacity as a 3-minute average for fugitive emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions determination shall include all non-stack egress points from the building housing this emissions unit. Such egress points shall include, but not be limited to, doorways, windows, and roof monitors.

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the control efficiency of the baghouse.

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 through 5. The emission tests shall be conducted at the baghouse inlet and outlet to establish the control efficiency of the control equipment. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

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).

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 emission 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.

## 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>
---	---	--

**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:** Bloom Grinder #2 (P272)

**Activity Description:** Repairs defects in steel

#### 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>
bloom grinder #2 controlled with a Wheelabrator baghouse  formerly (P072)	OAC rule 3745-31-05(A)(3) (PTI 15-0464)	0.68 lb/hr of particulate emissions  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-07(B), and 3745-17-08(B).
		See A.I.2.e below.
	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.c and A.I.2.d below.
	OAC rule 3745-17-11(B)	See A.I.2.d below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
  - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust; and
  - ii. the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.d The emission limitation required by this applicable rule is less stringent than the emission limitation required pursuant to the best available technology requirement specified in OAC rule 3745-31-05(A)(3).
- 2.e The collection efficiency of the baghouse shall not be less than 99.0%.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained between the range of 4.0 to 7.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly calibrate, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

## IV. Reporting Requirements

1. The permittee shall submit quarterly 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.I.1, as well as the corrective actions that were taken to bring the pressure drop back into the allowable range.
2. The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the non-stack egress points serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## V. Testing Requirements

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

- 1.a Emission Limitation:

0.68 lb/hr of particulate emissions with a minimum 99% removal efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

## V. Testing Requirements (continued)

### 1.b Emission Limitation:

20% opacity as a 6-minute average for stack emissions

Applicable Compliance Method:

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

### 1.c Emission Limitation:

20% opacity as a 3-minute average for fugitive emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions determination shall include all non-stack egress points from the building housing this emissions unit. Such egress points shall include, but not be limited to, doorways, windows, and roof monitors.

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the control efficiency of the baghouse.

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 through 5. The emission tests shall be conducted at the baghouse inlet and outlet to establish the control efficiency of the control equipment. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

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).

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 emission 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.

## 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>
---	---	--

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Emissions Unit ID:** No.1 Ladle Furnace (P282)

**Activity Description:** Aids in steel making process

#### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
no. 1 ladle furnace controlled by baghouse #4; this emissions unit replaced the existing #4 electric arc furnace (P903)  (formerly P082)	OAC rule 3745-31-05 (PTI-15-0575)	0.0052 gr/dscf of particulate emissions 3.2 lbs/hr of particulate emissions 14.1 tpy of particulate emissions
		11.75 lbs/hr of carbon monoxide (CO) 51.44 tpy of CO
		6.5 lbs/hr of sulfur dioxide (SO <sub>2</sub> ) 195 lbs/day of SO <sub>2</sub> 2.61 tons/month of SO <sub>2</sub> 31.33 tpy of SO <sub>2</sub>
		See A.II.2 below.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-07(B), and 3745-17-08(B).
	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.b and A.I.2.c below.
OAC rule 3745-17-11(B)	See A.I.2.c below.	
OAC rule 3745-18-06(E)(1)	See A.I.2.c below.	
OAC rule 3745-17-07(B)	See A.I.2.d below.	

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

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

- 2.b** The permittee shall minimize or eliminate visible particulate fugitive emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
- i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust; and
  - ii. the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.c** The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05(A)(3).
- 2.d** Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

## **II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained between the range of 4.0 to 8.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.
2. In the course of adding alloying materials to the molten steel, the permittee shall not exceed the following maximum amounts:  
  
500 lbs/hr of sulfur;  
  
1500 lbs/day of sulfur;  
  
21.9 tons/month of sulfur; and  
  
263 tpy of sulfur.
3. No oxygen injection shall take place in this emissions unit.
4. All sulfur injection shall be done by wire.
5. The overall sulfur recovery to the steel shall be at least 80%.

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

1. The permittee shall properly calibrate, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall maintain daily records of the following information:
  - a. the amount of sulfur added to the ladle furnace, in pounds;
  - b. the number of hours the emissions unit was in operation; and
  - c. the amount of sulfur added to the ladle furnace, in pounds per hour, average (i.e., (a)/(b)).
3. The permittee shall maintain monthly records of the amount of sulfur added to the ladle furnace, in tons.

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

4. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each hour during which the sulfur added to this emissions unit exceeded 500 lbs/hr, and the actual pounds of sulfur added to this emissions unit for each such hour;
  - b. an identification of each day during which the sulfur added to this emissions unit exceeded 1500 lbs/day, and the actual pounds of sulfur added to this emissions unit for each such day;
  - c. an identification of each month during which the sulfur added to this emissions unit exceeded 21.9 tons/month, and the actual tons of sulfur added to this emissions unit for each such month; and
  - d. all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1, as well as the corrective actions that were taken to bring the pressure drop back into the allowable range.
2. The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the non-stack egress points serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall also submit annual reports that specify the total CO, SO<sub>2</sub>, and particulate emissions for this emissions unit and the total amount of sulfur added to this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

### V. Testing Requirements

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

- 1.a Emission Limitations:

0.0052 gr/dscf of particulate emissions

3.2 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

14.1 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly allowable particulate emission limitation by the actual hours of operation during the year, and then dividing by 2000 lbs/ton.

**1.c** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

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

**1.d** Emission Limitation:

11.75 lbs/hr of CO

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**1.e** Emission Limitation:

51.44 tpy of CO

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly allowable particulate emission limitation by the actual hours of operation during the year, and then dividing by 2000 lbs/ton.

**1.f** Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

Because the SO<sub>2</sub> emissions emitted from the stack of baghouse #4 are generated by emissions units P264, P282, and P292, combined, compliance shall be demonstrated if the SO<sub>2</sub> stack test result is less than the combined limit of 709.02 lbs/hr. If the SO<sub>2</sub> stack test result is greater than the combined limit of 709.02 lbs/hr, then each of the emissions units that vent SO<sub>2</sub> emissions to baghouse #4 shall be considered out of compliance.

**1.g** Emission Limitation:

195 lbs/day of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly allowable SO<sub>2</sub> emission limitation by the maximum hours of operation during the day.

**V. Testing Requirements (continued)**

**1.h** Emission Limitation:

2.61 tons/month of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly allowable SO<sub>2</sub> emission limitation by the maximum hours of operation during the month, and then dividing by 2000 lbs/ton.

**1.i** Emission Limitation:

31.33 tpy of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly allowable SO<sub>2</sub> emission limitation by the actual hours of operation during the year, and then dividing by 2000 lbs/ton.

**1.j** Emission Limitation:

20% opacity as a 3-minute average (fugitives)

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

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

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

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

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

for particulates - 40 CFR Part 60, Appendix A, Methods 1 through 5;

for SO<sub>2</sub> - 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6; and

for CO - 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The following parameters, at a minimum, shall be monitored and recorded during the emission testing: the process weight rate (in tons) and the pressure drop across the baghouse.

e. The particulate and CO test(s) shall be conducted while this emissions unit is operating at or near its maximum production rate, unless otherwise specified or approved by the Canton local air agency. The SO<sub>2</sub> test(s) shall be conducted while emissions units P264, P282, and P292 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The isolation butterfly damper in the main air duct shall be in the closed position during each compliance test.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the 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).

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 emission 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.

## **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>
---	---	--

**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:** New Bar Mill (P284)

**Activity Description:** Heats and shapes steel

#### 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>
228 mmBtu/hr natural gas-fired reheat furnace controlled with low NOx burners	OAC rule 3745-31-05(A)(3) (PTI 15-1250)	3.1 lbs/hr of particulate emissions 13.7 tpy of particulate emissions
		0.13 lb/mmBtu of nitrogen oxides (NOx) 30.0 lbs/hr of NOx 131.4 tpy of NOx
		8.0 lbs/hr of carbon monoxide (CO) 35 tpy of CO
		0.6 lb/hr of organic compounds (OC) 2.8 tpy of OC
		Compliance with this rule also includes compliance with OAC rule 3745-18-06(E)(1).
	OAC rule 3745-17-11	See A.I.2.a below.
	OAC rule 3745 -17-07(A)	See A.I.2.b below.
OAC rule 3745-18-06(E)(1)	See A.I.2.c below.	
OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.d below.	

##### 2. Additional Terms and Conditions

- The uncontrolled mass rate of particulate emissions (PE)\* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

\* The burning of natural gas is the only source of PE from this emissions unit.

- This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- Sulfur dioxide emissions shall not exceed 351.1 lbs/hr.

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

- 2.d** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established in Permit to Install 15-1250.

## **II. Operational Restrictions**

1. The permittee shall employ only natural gas as fuel in this emissions unit.

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

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. Records shall be maintained of the total annual amount of natural gas burned in this emissions unit.

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## **V. Testing Requirements**

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

**1.a** Emission Limitation:

3.1 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the particulate emission factor of 1.9 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.228 mmscf/hr). The particulate emission factor was obtained from AP-42, 5th Edition, Table 1.4-2, page 1.4-6, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

**1.b** Emission Limitation:

13.7 tpy of particulate emissions

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable particulate emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly particulate emission limitation.

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

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

Applicable Compliance Method:

The NO<sub>x</sub> emission rate may be calculated by multiplying the NO<sub>x</sub> emission factor of 140 lbs/mm<sup>3</sup> of natural gas by the emissions unit's maximum hourly natural gas firing rate (.228 mm<sup>3</sup>/hr). The NO<sub>x</sub> emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 or 7E.

**1.d** Emission Limitation:

0.13 lb/mmBtu of NO<sub>x</sub>

Applicable Compliance Method:

The NO<sub>x</sub> emission rate may be based upon the NO<sub>x</sub> emission factor of .14 lb/mmBtu. The NO<sub>x</sub> emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 or 7E.

**1.e** Emission Limitation:

131.4 tpy of NO<sub>x</sub>

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable NO<sub>x</sub> emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly NO<sub>x</sub> emission limitation.

**1.f** Emission Limitation:

8.0 lbs/hr of CO

Applicable Compliance Method:

The CO emission rate may be calculated by multiplying the CO emission factor of 84 lbs/mm<sup>3</sup> of natural gas by the emissions unit's maximum hourly natural gas firing rate (.228 mm<sup>3</sup>/hr). The CO emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**1.g** Emission Limitation:

35 tpy of CO

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable CO emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly CO emission limitation.

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

### **1.h Emission Limitation:**

0.6 lb/hr of OC

Applicable Compliance Method:

The OC emission rate may be calculated by multiplying the NMOC emission factor of 8.7 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.228 mmscf/hr). The NMOC emission factor was obtained from AP-42, 5th Edition, Table 1.4-2, page 1.4-6, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 25.

### **1.i Emission Limitation:**

2.8 tpy of OC

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable OC emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly OC emission limitation.

### **1.j Emission Limitation:**

Sulfur dioxide emissions shall not exceed 351.1 lbs/hr.

Applicable Compliance Method:

The sulfur dioxide emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials employed in this emissions unit do not generate sulfur dioxide emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

## **VI. Miscellaneous Requirements**

- 1.** Due to revisions of the AP-42 emission factors, the permittee cannot currently comply with the NO<sub>x</sub>, CO, and OC emission limitations established for this emissions unit. As the initial step to allow this emissions unit to achieve compliance, the permittee shall submit a complete permit to install application within two months of the effective date of this permit.

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**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:** Reheat Furnace (P285)  
**Activity Description:** Heats steel

#### 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>
38.4 mmBtu/hr natural gas-fired reheat furnace controlled with low NOx burners	OAC rule 3745-31-05(A)(3) (PTI 15-1250)	0.5 lbs/hr of particulate emissions 2.3 tpy of particulate emissions
		0.13 lb/mmBtu of nitrogen oxides (NOx) 5.0 lbs/hr of NOx 21.9 tpy of NOx
		1.3 lbs/hr of carbon monoxide (CO) 5.9 tpy of CO
		0.11 lb/hr of organic compounds (OC) 0.5 tpy of OC
		Compliance with this rule also includes compliance with OAC rule 3745-18-06(E)(1).
	OAC rule 3745-17-11	See A.I.2.a below.
	OAC rule 3745 -17-07(A)	See A.I.2.b below.
OAC rule 3745-18-06(E)(1)	See A.I.2.c below.	
OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.d below.	

##### 2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions (PE)\* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

\* The burning of natural gas is the only source of PE from this emissions unit.

- 2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

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

**2.c** Sulfur dioxide emissions shall not exceed 351.1 lbs/hr.

**2.d** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established in Permit to Install 15-1250.

## **II. Operational Restrictions**

1. The permittee shall employ only natural gas as fuel in this emissions unit.

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

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

2. Records shall be maintained of the total annual amount of natural gas burned in this emissions unit.

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## **V. Testing Requirements**

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

**1.a** Emission Limitation:

0.5 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the particulate emission factor of 1.9 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.038 mmscf/hr). The particulate emission factor was obtained from AP-42, 5th Edition, Table 1.4-2, page 1.4-6, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

**1.b** Emission Limitation:

2.3 tpy of particulate emissions

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable particulate emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly particulate emission limitation.

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

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

Applicable Compliance Method:

Compliance with this emission limitation may be determined by multiplying the NO<sub>x</sub> emission factor of 50 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.038 mmscf/hr). The NO<sub>x</sub> emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 or 7E.

**1.d** Emission Limitation:

0.13 lb/mmBtu of NO<sub>x</sub>

Applicable Compliance Method:

Compliance with this emission limitation may be based upon the NO<sub>x</sub> emission factor of .05 lb/mmBtu. The NO<sub>x</sub> emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 or 7E.

**1.e** Emission Limitation:

21.9 tpy of NO<sub>x</sub>

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable NO<sub>x</sub> emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly NO<sub>x</sub> emission limitation.

**1.f** Emission Limitation:

1.3 lbs/hr of CO

Applicable Compliance Method:

The CO emission rate may be calculated by multiplying the CO emission factor of 84 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.038 mmscf/hr). The CO emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**1.g** Emission Limitation:

5.9 tpy of CO

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable CO emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly CO emission limitation.

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

### **1.h** Emission Limitation:

0.11 lb/hr of OC

Applicable Compliance Method:

The OC emission rate may be calculated by multiplying the NMOC emission factor of 8.7 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.038 mmscf/hr). The NMOC emission factor was obtained from AP-42, 5th Edition, Table 1.4-2, page 1.4-6, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 25.

### **1.i** Emission Limitation:

0.5 tpy of OC

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable OC emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly OC emission limitation.

## **VI. Miscellaneous Requirements**

- 1.** Due to revisions of the AP-42 emission factors, the permittee cannot currently comply with the CO and OC emission limitations established for this emissions unit. As the initial step to allow this emissions unit to achieve compliance, the permittee shall submit a complete permit to install application within two months of the effective date of this permit.

**B. State Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**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:** Bloom Grinder #3 (P286)  
**Activity Description:** Repairs defects in steel

#### 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>
bloom grinder #3 controlled with a Wheelabrator baghouse  formerly (P086)	OAC rule 3745-31-05(A)(3) (PTI 15-0615)	0.68 lb/hr of particulate emissions  3.0 tpy of particulate emissions  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-07(B), and 3745-17-08(B).
		See A.I.2.e below.
	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.c and A.I.2.d below.
	OAC rule 3745-17-11(B)	See A.I.2.d below.

##### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
- 2.c The permittee shall minimize or eliminate visible fugitive particulate emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
  - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust; and
  - ii. the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.d The emission limitation required by this applicable rule is less stringent than the emission limitation required pursuant to the best available technology requirement specified in OAC rule 3745-31-05(A)(3).
- 2.e The collection efficiency of the baghouse shall not be less than 99.0%.

## **II. Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained between the range of 4.0 to 7.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall properly calibrate, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly 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.I.1, as well as the corrective actions that were taken to bring the pressure drop back into the allowable range.
2. The permittee shall submit the deviation (excursion) reports in accordance with the requirements specified in Part I - General Term and Condition A.1.c.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the non-stack egress points serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall also submit annual reports that specify the total particulate emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702.

## **V. Testing Requirements**

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

### **1.a Emission Limitation:**

0.68 lb/hr of particulate emissions with a minimum 99% removal efficiency

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

3.0 tpy of particulate emissions

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable particulate emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly particulate emission limitation.

**1.c** Emission Limitation:

20% opacity as a 6-minute average for stack emissions

Applicable Compliance Method:

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

**1.d** Emission Limitation:

20% opacity as a 3-minute average for fugitive emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions determination shall include all non-stack egress points from the building housing this emissions unit. Such egress points shall include, but not be limited to, doorways, windows, and roof monitors.

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

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

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates and the control efficiency of the baghouse.

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 through 5. The emission tests shall be conducted at the baghouse inlet and outlet to establish the control efficiency of the control equipment. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the 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).

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 emission 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.

## **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>
---	---	--

**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:** Pangborn Shot Blaster (P287)

**Activity Description:** Removes scale from steel

### A. State and Federally Enforceable Section

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pangborn shot blaster controlled with a baghouse - used to prepare bars and billets for the Elkem and Krautkramer inspection units  (formerly P087)	OAC rule 3745-31-05(A)(3) (PTI 15-0849)	0.43 lb/hr of particulate emissions  1.88 tpy of particulate emissions
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). See A.I.2.a below.
	OAC rule 3745-17-11(B)	See A.I.2.b below.

#### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b The particulate emission limitation required by OAC rule 3745-17-11 is less stringent than the particulate emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05(A)(3).

### II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 1.0 to 6.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.

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

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

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1, as well as the corrective actions that were taken to bring the pressure drop back into the allowable range.

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

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

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

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:
  - 1.a Emission Limitation:  
  
0.43 lb/hr of particulate emissions  
  
Applicable Compliance Method:  
  
Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
  - 1.b Emission Limitation:  
  
20% opacity as a 6-minute average for stack emissions  
  
Applicable Compliance Method:  
  
If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
  - 1.c Emission Limitation:  
  
1.88 tpy of particulate emissions  
  
Applicable Compliance Method:  
  
This emission limitation was established by multiplying the hourly allowable particulate emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly particulate emission limitation.
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months after issuance of the permit and within 6 months prior to expiration of the permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates.
  - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the 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 and date of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Canton local air agency's refusal to accept the results of the emission tests.

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 containing the results of the emission 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 of the 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**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:** Tundish Preheater (P288)

**Activity Description:** Preheats steel

#### 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>
tundish preheater with a maximum capacity of 12 mmBtu/hr and fired with natural gas - vented to baghouse #5  (formerly P088)	OAC rule 3745-31-05 (PTI 15-1096)	0.03 lb/hr of particulate emissions 0.131 tpy of particulate emissions
		0.14 lb/mmBtu of nitrogen oxides (NOx) 1.68 lbs/hr of NOx 7.36 tpy of NOx
		0.035 lb/mmBtu of carbon monoxide (CO) 0.42 lb/hr of CO 1.84 tpy of CO
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B), 3745-17-08(B), and 3745-18-06(E).
	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.d below.
	OAC rules 3745-17-07(A) and 3745-17-11(B)	See A.I.2.e below.

##### 2. Additional Terms and Conditions

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

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

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

At a minimum, the permittee's employment of RACM shall include the use of natural gas as fuel for the tundish preheater. No additional controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials employed in this emissions unit do not generate particulate emissions during the heating process.

If the permittee can demonstrate compliance with the visible emission limitation contained in section A.I.2.a above, the employment of the permittee's RACM, in accordance with the requirement of section A.I.2.b above, will be deemed adequate.

- 2.c** Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 362.5 lbs/hr.
- 2.d** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established in Permit to Install 15-1096.
- 2.e** The visible particulate emission limitations and the particulate emission limitation required by OAC rule 3745-17-07(A) and OAC rule 3745-17-11, respectively, are less stringent than the visible particulate emission limitation and the particulate emission limitation established in 40 CFR Part 60, Subpart AA. Although 40 CFR Part 60, Subpart AA is not an applicable rule for emissions unit P288, the emissions from this emissions unit are combined with other emissions from the facility and are vented to a common baghouse.

Emissions units P222, P258, P259, P288, P289, Z201, and Z202 are all vented to baghouse #5, and, as such, must not emit more than 3.0% opacity or more than 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases (gr/dscf) from the baghouse stack in accordance with 40 CFR Part 60, Subpart AA.

## **II. Operational Restrictions**

1. The permittee shall employ only natural gas as fuel in this emissions unit.

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

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

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## **V. Testing Requirements**

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

**1.a** Emission Limitation:

20% opacity as a 3-minute average for fugitive emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

0.03 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the particulate emission factor of 1.9 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.012 mmscf/hr). The particulate emission factor was obtained from AP-42, 5th Edition, Table 1.4-2, page 1.4-6, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

**1.c** Emission Limitation:

0.131 tpy of particulate emissions

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable particulate emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly particulate emission limitation.

**1.d** Emission Limitation:

1.68 lbs/hr of NOx

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the NOx emission factor of 50 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.012 mmscf/hr). The NOx emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

**1.e** Emission Limitation:

0.14 lb/mmBtu of NOx

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the NOx emission factor of 50 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.012 mmscf/hr) and dividing by the emissions unit's maximum rated heat input capacity (12 mmBtu/hr). The NOx emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

**1.f** Emission Limitation:

7.36 tpy of NOx

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable NOx emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly NOx emission limitation.

**V. Testing Requirements (continued)**

**1.g** Emission Limitation:

0.42 lb/hr of CO

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the CO emission factor of 84 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.012 mmscf/hr). The CO emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**1.h** Emission Limitation:

0.035 lb/mmBtu of CO

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the CO emission factor of 84 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.012 mmscf/hr) and dividing by the emissions unit's maximum rated heat input capacity (12 mmBtu/hr). The CO emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**1.i** Emission Limitation:

1.84 tpy of CO

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable CO emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly CO emission limitation.

**1.j** Emission Limitation:

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

Applicable Compliance Method:

The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials employed in this emissions unit do not generate SO<sub>2</sub> emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

**1.k** Emission Limitation:

3% opacity as a 6-minute average for stack emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

## V. Testing Requirements (continued)

### 1.1 Emission Limitation:

0.0052 gr/dscf of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

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

- a. The emission testing shall be conducted within 6 months of issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The following parameters, at a minimum, shall be monitored and recorded during the emission testing: the process weight rate (in tons) and the pressure drop across the baghouse.
- e. The test(s) shall be conducted while emissions units P222, P258, P259, P288, P289, Z201, and Z202 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The isolation butterfly damper in the main air duct shall be in the closed position during each emission test.

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).

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 containing the results of the emission 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 of the 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**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:** Tundish Preheater (P289)

**Activity Description:** Preheats steel

### 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>
tundish preheater with a maximum capacity of 12 mmBtu/hr and fired with natural gas - vented to baghouse #5  (formerly P089)	OAC rule 3745-31-05 (PTI 15-1096)	0.03 lb/hr of particulate emissions 0.131 tpy of particulate emissions
		0.14 lb/mmBtu of nitrogen oxides (NOx) 1.68 lbs/hr of NOx 7.36 tpy of NOx
		0.035 lb/mmBtu of carbon monoxide (CO) 0.42 lb/hr of CO 1.84 tpy of CO
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B), 3745-17-08(B), and 3745-18-06(E).
	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.b below.
	OAC rule 3745-18-06(E)(1)	See A.I.2.c below.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.d below.
	OAC rules 3745-17-07(A) and 3745-17-11(B)	See A.I.2.e below.

#### 2. Additional Terms and Conditions

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

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

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

At a minimum, the permittee's employment of RACM shall include the use of natural gas as fuel for the tundish preheater. No additional controls are necessary for this emissions unit to satisfy the reasonably available control measure requirements specified in OAC rule 3745-17-08(B), because the process materials employed in this emissions unit do not generate particulate emissions during the heating process.

If the permittee can demonstrate compliance with the visible emission limitation contained in section A.I.2.a above, the employment of the permittee's RACM, in accordance with the requirement of section A.I.2.b above, will be deemed adequate.

- 2.c** Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 362.5 lbs/hr.
- 2.d** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established in Permit to Install 15-1096.
- 2.e** The visible particulate emission limitations and the particulate emission limitation required by OAC rule 3745-17-07(A) and OAC rule 3745-17-11, respectively, are less stringent than the visible particulate emission limitation and the particulate emission limitation established in 40 CFR Part 60, Subpart AA. Although 40 CFR Part 60, Subpart AA is not an applicable rule for emissions unit P289, the emissions from this emissions unit are combined with other emissions from the facility and are vented to a common baghouse.

Emissions units P222, P258, P259, P288, P289, Z201, and Z202 are all vented to baghouse #5, and, as such, must not emit more than 3.0% opacity or more than 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases (gr/dscf) from the baghouse stack in accordance with 40 CFR Part 60, Subpart AA.

## **II. Operational Restrictions**

1. The permittee shall employ only natural gas as fuel in this emissions unit.

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

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

## **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

## **V. Testing Requirements**

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

**1.a** Emission Limitation:

20% opacity as a 3-minute average for fugitive emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

0.03 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the particulate emission factor of 1.9 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.012 mmscf/hr). The particulate emission factor was obtained from AP-42, 5th Edition, Table 1.4-2, page 1.4-6, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

**1.c** Emission Limitation:

0.131 tpy of particulate emissions

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable particulate emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly particulate emission limitation.

**1.d** Emission Limitation:

1.68 lbs/hr of NOx

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the NOx emission factor of 50 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.012 mmscf/hr). The NOx emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

**1.e** Emission Limitation:

0.14 lb/mmBtu of NOx

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the NOx emission factor of 50 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.012 mmscf/hr) and dividing by the emissions unit's maximum rated heat input capacity (12 mmBtu/hr). The NOx emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

**1.f** Emission Limitation:

7.36 tpy of NOx

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable NOx emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly NOx emission limitation.

**V. Testing Requirements (continued)**

**1.g** Emission Limitation:

0.42 lb/hr of CO

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the CO emission factor of 84 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.012 mmscf/hr). The CO emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**1.h** Emission Limitation:

0.035 lb/mmBtu of CO

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the CO emission factor of 84 lbs/mmscf of natural gas by the emissions unit's maximum hourly natural gas firing rate (.012 mmscf/hr) and dividing by the emissions unit's maximum rated heat input capacity (12 mmBtu/hr). The CO emission factor was obtained from AP-42, 5th Edition, Table 1.4-1, page 1.4-5, dated 7/98.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

**1.i** Emission Limitation:

1.84 tpy of CO

Applicable Compliance Method:

This emission limitation was established by multiplying the hourly allowable CO emission limitation by 8760 hours of operation during the year, and then dividing by 2000 lbs/ton. Compliance with this emission limitation can be assumed provided that the permittee complies with the hourly CO emission limitation.

**1.j** Emission Limitation:

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

Applicable Compliance Method:

The SO<sub>2</sub> emissions generated by this emissions unit are due solely to the combustion of natural gas. The process materials employed in this emissions unit do not generate SO<sub>2</sub> emissions during the heating process.

Compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

**1.k** Emission Limitation:

3% opacity as a 6-minute average for stack emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

## V. Testing Requirements (continued)

### 1.1 Emission Limitation:

0.0052 gr/dscf of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

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

- a. The emission testing shall be conducted within 6 months of issuance of this permit and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate emissions.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The following parameters, at a minimum, shall be monitored and recorded during the emission testing: the process weight rate (in tons) and the pressure drop across the baghouse.
- e. The test(s) shall be conducted while emissions units P222, P258, P259, P288, P289, Z201, and Z202 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The isolation butterfly damper in the main air duct shall be in the closed position during each emission test.

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).

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 containing the results of the emission 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 of the 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**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 EAF (P292)  
**Activity Description:** Produces steel product

#### 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 electric arc furnace with roof control exhaust system vented to baghouse #4  (formerly P902)	OAC rule 3745-17-07(A)	See A.I.2.a below.
	OAC rule 3745-17-07(B)(1)	See A.I.2.b below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.c and A.I.2.d below.
	OAC rule 3745-17-11(B)	See A.I.2.d below.
	OAC rule 3745-18-06(E)(1)	244.68 lbs/hr of sulfur dioxide (SO <sub>2</sub> )

##### 2. Additional Terms and Conditions

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

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

- 2.d** The particulate emission limitations required by OAC rule 3745-17-08(B) and OAC rule 3745-17-11 are less stringent than the particulate emission limitation established in PTI 15-0575 pursuant to the best available technology requirement specified in OAC rule 3745-31-05(A)(3) for emissions unit P282. Although PTI 15-0575 is not applicable for emissions unit P292, the emissions from this emissions unit are combined with other emissions from the facility and are vented to a common baghouse.

Emissions units P264, P282, and P292 are all vented to baghouse #4, and, as such, must not emit more than 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases (gr/dscf) from the baghouse stack in accordance with PTI 15-0575.

## **II. Operational Restrictions**

1. The pressure differential across baghouse #4 shall be maintained between the range of 4.0 to 8.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.

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

1. The permittee shall properly calibrate, operate, and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

## **IV. Reporting Requirements**

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

## **V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

0.0052 gr/dscf of particulate emissions from baghouse #4

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**1.b** Emission Limitation:

20% opacity as a 6-minute average for stack emissions

Applicable Compliance Method:

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

**1.c** Emission Limitation:

20% opacity as a 3-minute average for fugitive emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations of fugitive dust performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

**1.d** Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

Because the SO<sub>2</sub> emissions emitted from the stack of baghouse #4 are generated by emissions units P264, P282, and P292, combined, compliance shall be demonstrated if the tested SO<sub>2</sub> emission rate is less than the combined limit of 709.02 lbs/hr. If the tested SO<sub>2</sub> emission rate is greater than the combined limit of 709.02 lbs/hr, then each of the emissions units that vent SO<sub>2</sub> emissions to baghouse #4 shall be considered out of compliance.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit, at the outlets of baghouse #4, in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months of issuance of the permit and within 6 months prior to expiration of the permit.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates and SO<sub>2</sub>.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates, 40 CFR Part 60, Appendix A, Methods 1 through 5 and for SO<sub>2</sub>, 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The following parameters, at a minimum, shall be monitored and recorded during the emission testing: the process weight rate (in tons) and the pressure drop across each baghouse.
  - e. The particulate test(s) shall be conducted while this emissions unit is operating at or near its maximum production rate, unless otherwise specified or approved by the Canton local air agency. The SO<sub>2</sub> test(s) shall be conducted while emissions units P264, P282, and P292 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The isolation butterfly damper in the main air duct shall be in the closed position during each compliance test.

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 and date of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Canton local air agency's refusal to accept the results of the emission tests.

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 containing the results of the emission 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 of the 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**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:** Slag Processing (Z201)

**Activity Description:** Slag Processing

### 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>
slag processing controlled by baghouse #5	OAC rule 3745-17-07(B)(1)	See A.1.2.a below.
	OAC rule 3745-17-08(B)(3)	See A.1.2.b below.
	OAC rule 3745-17-07(A)	See A.1.2.c below.
	OAC rule 3745-17-11(B)	See A.1.2.c below.

#### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions of fugitive dust shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.b The permittee shall minimize or eliminate visible particulate fugitive emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
  - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust; and
  - ii. the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.c The visible particulate emission limitations and the particulate emission limitation required by OAC rule 3745-17-07(A) and OAC rule 3745-17-11, respectively, are less stringent than the visible particulate emission limitation and the particulate emission limitation established in 40 CFR Part 60, Subpart AA. Although 40 CFR Part 60, Subpart AA is not an applicable rule for emissions unit Z201, the emissions from this emissions unit are combined with other emissions from the facility and are vented to a common baghouse.

Emissions units P222, P258, P259, P288, P289, Z201, and Z202 are all vented to baghouse #5, and, as such, must not emit more than 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases (gr/dscf) from the baghouse stack in accordance with 40 CFR Part 60, Subpart AA.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained between the range of 4.0 to 8.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly calibrate, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

## IV. Reporting Requirements

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

## V. Testing Requirements

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

- 1.a Emission Limitation:

20% opacity as a 3-minute average for fugitive emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions determinations shall include all non-stack egress points from the building housing this emissions unit. Such egress points shall include, but not be limited to, doorways, windows, and roof monitors.

## V. Testing Requirements (continued)

### 1.b Emission Limitation:

3% opacity as a 6-minute average for stack emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

### 1.c Emission Limitation:

0.0052 gr/dscf of particulate emissions from baghouse #5

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2 below.

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

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

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

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The following parameters, at a minimum, shall be monitored and recorded during the emission testing: the process weight rate (in tons) and the pressure drop across the baghouse.

e. The test(s) shall be conducted while emissions units P222, P258, P259, P288, P289, Z201, and Z202 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The isolation butterfly damper in the main air duct shall be in the closed position during each emission test.

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 and date of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Canton local air agency's refusal to accept the results of the emission tests.

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 containing the results of the emission 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 of the 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**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:** Hot Metal Transfer (Z202)

**Activity Description:** Hot Metal Transfer

### 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>
hot metal transfer controlled by baghouse #5	OAC rule 3745-17-07(B)(1)	See A.I.2.a below.
	OAC rule 3745-17-08(B)(3)	See A.I.2.b below.
	OAC rule 3745-17-07(A)	See A.I.2.c below.
	OAC rule 3745-17-11(B)	See A.I.2.c below.

#### 2. Additional Terms and Conditions

- 2.a Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average. For purposes of verifying compliance with this requirement, the visible particulate emissions of fugitive dust shall be observed at any non-stack egress point from the building housing this emissions unit. These egress points shall include, but not be limited to, doorways, windows, and roof monitors.
- 2.b The permittee shall minimize or eliminate visible particulate fugitive emissions through the employment of reasonably available control measures (RACM). These measures shall include, but not be limited to, the following:
  - i. the installation and use of hoods, fans, and other equipment to adequately enclose, contain, capture, vent, and control the fugitive dust; and
  - ii. the collection efficiency is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the point(s) of capture to the extent possible with good engineering design.
- 2.c The visible particulate emission limitations and the particulate emission limitation required by OAC rule 3745-17-07(A) and OAC rule 3745-17-11, respectively, are less stringent than the visible particulate emission limitation and the particulate emission limitation established in 40 CFR Part 60, Subpart AA. Although 40 CFR Part 60, Subpart AA is not an applicable rule for emissions unit Z202, the emissions from this emissions unit are combined with other emissions from the facility and are vented to a common baghouse.

Emissions units P222, P258, P259, P288, P289, Z201, and Z202 are all vented to baghouse #5, and, as such, must not emit more than 0.0052 grain of particulate emissions per dry standard cubic foot of exhaust gases (gr/dscf) from the baghouse stack in accordance with 40 CFR Part 60, Subpart AA.

## II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained between the range of 4.0 to 8.0 inches of water while the emissions unit is in operation or within the pressure drop range established during the most recent emission test that demonstrated the emissions unit was in compliance.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly calibrate, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis while the emissions unit is in operation.
2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the non-stack egress points serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

## IV. Reporting Requirements

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

## V. Testing Requirements

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

- 1.a Emission Limitation:

20% opacity as a 3-minute average for fugitive emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3). The points of observation for visible emissions determinations shall include all non-stack egress points from the building housing this emissions unit. Such egress points shall include, but not be limited to, doorways, windows, and roof monitors.

## V. Testing Requirements (continued)

### 1.b Emission Limitation:

3% opacity as a 6-minute average for stack emissions

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

### 1.c Emission Limitation:

0.0052 gr/dscf of particulate emissions from baghouse #5

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2 below.

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

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

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

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The following parameters, at a minimum, shall be monitored and recorded during the emission testing: the process weight rate (in tons) and the pressure drop across the baghouse.

e. The test(s) shall be conducted while emissions units P222, P258, P259, P288, P289, Z201, and Z202 are operating at or near maximum production rates, unless otherwise specified or approved by the Canton local air agency. The isolation butterfly damper in the main air duct shall be in the closed position during each emission test.

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 and date of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Canton local air agency's refusal to accept the results of the emission tests.

Personnel from the Canton local air agency shall be permitted to witness the tests, 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 containing the results of the emission 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 of the 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**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

\*\*\*\*\*

**THIS IS THE LAST PAGE OF THE PERMIT**

\*\*\*\*\*