OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
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Columbus, OH 43215

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

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P.O. Box 1049
Columbus, OH 43216-1049

11/28/01

RE: Proposed Title V Chapter 3745-77 Permit
06-07-09-0013
Wheeling-Pittsburgh Steel Corporation - Martins Ferry

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

Dear Ms. Damico:

The proposed issuance of the Title V permit for Wheeling-Pittsburgh Steel Corporation - Martins Ferry, has been created in Ohio EPA's State Air Resources System (STARS) on 11/28/01, 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

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

cc: Southeast District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 11/28/01	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: 06-07-09-0013 to:
Wheeling-Pittsburgh Steel Corporation - Martins Ferry
1001 Main Street
Martins Ferry, OH 43935-1796

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

B001 (Boiler No. 1)
Babcock and Wilcox G9B Boiler - 72 MMBTU/hr, converted to natural gas in 1993

B002 (Boiler No. 2)
Sterling GFD Boiler - 36 MMBTU/hr, converted to natural gas in 1993

F001 (Roads and Parking Areas)
Plant roadways and parking areas

P901 (Galvanizing Line No. 1)
Wean 36" Hot Dip Galvanizing Line with natural gas fired dryers.

P902 (Galvanizing Line No. 2)
Wean 48" Hot Dip Galvanizing Line with natural gas fired dryers.

P903 (Galvanizing Line No. 3)
Wean 60" Hot Dip Galvanizing Line with natural gas fired dryers.

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

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

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

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

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

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

i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> contained in this permit shall be submitted to

the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

   i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but

excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Insignificant Activity

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

B. State Only Enforceable Section

1. Permit to Install Requirement

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

B008 - boiler no. 8 (9 mmBtu/hr gas fired boiler);
B009 - boiler no. 9 (9 mmBtu/hr gas fired boiler);
B010 - boiler no. 10 (9 mmBtu/hr gas fired boiler);
F003 - salt and lime storage and handling;
Z004 - temper mill;
Z005 - corrugating line;
Z006 - parts washers;
Z007 - waste water treatment plant;
Z008 - diesel emergency generator (< 500 hr/yr);
Z009 - HCl storage tank (MF-2);
Z010 - HCl storage tank (MF-3);
Z011 - coating oil storage tank (galvanizing lines);
Z012 - coating oil storage tank (temper mill);
Z013 - diesel fuel storage tank (MF-5);
Z014 - diesel fuel storage tank (MF-6);
Z015 - diesel fuel storage tank (MF-7);
Z016 - diesel fuel storage tank (MF-8);
Z017 - diesel fuel storage tank (MF-16); and
Z019 - gasoline storage tank (MF-15).

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler No. 1 (B001)

Activity Description: Babcock and Wilcox G9B Boiler - 72 MMBTU/hr, converted to natural gas in 1993

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Babcock and Wilcox G9B boiler - 72 mmBtu/hr, converted to natural gas in 1993	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except for a period of 6 consecutive minutes in a 60-minute period. Visible particulate emissions shall not exceed 60% opacity, as a 6-minute average, at any time.
	OAC rule 3745-17-10(B)	Particulate emissions shall not exceed 0.020 pound per mmBtu of actual heat input.
	OAC rule 3745-18-13(C)(1)	Sulfur dioxide (SO2) emissions shall not exceed 5.78 pounds per mmBtu of actual heat input.

2. Additional Terms and Conditions

None

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.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

20% opacity as a 6-minute average 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 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

1.b Emission Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing requirements specified in 40 CFR Part 60, Appendix B, Methods 1 through 5.

1.c Emission Limitation:

5.78 pounds of SO2 per mmBtu of actual heat input

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing requirements specified in 40 CFR Part 60, Appendix B, 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Babcock and Wilcox G9B boiler - 72 mmBtu/hr, converted to natural gas in 1993	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler No. 2 (B002)

Activity Description: Sterling GFD Boiler - 36 MMBTU/hr, converted to natural gas in 1993

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Sterling GFD boiler - 36 mmBtu/hr, converted to natural gas in 1993	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except for a period of 6 consecutive minutes in a 60-minute period. Visible particulate emissions shall not exceed 60% opacity, as a 6-minute average, at any time.
	OAC rule 3745-17-10(B)	Particulate emissions shall not exceed 0.020 pound per mmBtu of actual heat input.
	OAC rule 3745-18-13(C)(1)	Sulfur dioxide (SO2) emissions shall not exceed 5.78 pounds per mmBtu of actual heat input.

2. Additional Terms and Conditions

None

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.1 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

20% opacity as a 6-minute average 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 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

1.b Emission Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing requirements specified in 40 CFR Part 60, Appendix B, Methods 1 through 5.

1.c Emission Limitation:

5.78 pounds of SO2 per mmBtu of actual heat input

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing requirements specified in 40 CFR Part 60, Appendix B, 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Sterling GFD boiler - 36 mmBtu/hr, converted to natural gas in 1993	None	None

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: Roads and Parking Areas (F001)

Activity Description: Plant roadways and parking areas

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paved roadways and parking areas (see section A.I.2.a)	OAC rule 3745-17-07(B)(4)	no visible particulate emissions except for 6 minutes during any 60-minute period
	OAC rule 3745-17-08(B), (B)(8), (B)(9)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.c, A.I.2.d, A.I.2.f, and A.I.2.h through A.I.1.j)
unpaved roadways and parking areas (see section A.I.2.b)	OAC rule 3745-17-07(B)(5)	no visible particulate emissions except for 13 minutes during any 60-minute period
	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see sections A.I.2.e through A.I.2.j)

2. Additional Terms and Conditions

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

paved roadways:

north plant roadways
scale roadway

paved parking areas:

general office parking
employee parking

2. Additional Terms and Conditions (continued)

2.b The unpaved roadways 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:

scales unpaved roadways

unpaved parking areas:

none

2.c The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by sweeping at sufficient treatment frequencies to ensure compliance and by posting and enforcing the speed limit of 10 mph for all vehicles. 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 or 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 or dust suppression chemicals at sufficient treatment frequencies to ensure compliance and by posting and enforcing the speed limit of 10 mph for all vehicles. 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. Except as otherwise provided in this section, the permittee shall perform inspections of each of the paved and unpaved roadway segments and each parking area in accordance with the following frequencies:

paved roadways	minimum inspection frequency
all	weekly

paved parking areas	minimum inspection frequency
all	weekly

unpaved roadways	minimum inspection frequency
all	daily

2. The purpose of the inspections is to determine the need for implementing any other control measures, in addition to the above-mentioned control measure. 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 appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

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

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

b. the date of each inspection where it was determined by the permittee that it was necessary to implement any other control measures, in addition to the above-mentioned control measure, to ensure compliance.

c. the dates any additional control measures were implemented; and

d. on a calendar quarter basis, the total number of days any additional 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 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 or week during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when any additional 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 the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paved roadways and parking areas	None	None
unpaved roadways and parking areas	None	None

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: Galvanizing Line No. 1 (P901)

Activity Description: Wean 36" Hot Dip Galvanizing Line with natural gas fired dryers.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
36" galvanizing line, a gas-fired dryer, and a hot dip zinc pot controlled by a baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except for a period of 6 consecutive minutes in a 60-minute period. Visible particulate emissions shall not exceed 60% opacity, as a 6-minute average, at any time.
	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	Reasonably available control measures shall be implemented to minimize or eliminate the visible emissions of fugitive dust. See A.I.2.a through A.I.2.c below.
	OAC rule 3745-17-11(B)(1)	Total combined particulate emissions from emissions units P901, P902, and P903 shall not exceed 27.9 lbs/hr (based on curve P-1 of Figure II).
	OAC rule 3745-18-06	Emissions of sulfur dioxide (SO2) shall not exceed 259.3 lbs/hr.

2. Additional Terms and Conditions

2.a The permittee shall employ reasonable available control measures on the hot dip zinc pot equipment 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 maintaining enclosures of such equipment to ensure compliance. Also, the permittee shall maintain and employ the hoods and ducts over the galvanizing kettle to minimize the headroom and air gaps and ensure that the fumes are captured to the extent possible with good engineering design, in order to minimize or eliminate visible emissions of fugitive dust at the capture location(s). Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.b 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

1. The production rate for this emissions unit shall not exceed 25 tons per hour, or 160 tons per hour combined from emissions units P901, P902, and P903.

2. The pressure drop across each baghouse module shall be maintained within the range of 1.0 to 10.0 inches of water while the emissions unit is in operation.

3. The permittee shall maintain an inventory of replacement bags equal to or greater than 10% of the total number of bags in all baghouse modules. The permittee shall restock filter bags to the 10% spare quantity standard within 30 days of falling below the standard.

III. Monitoring and/or Record Keeping Requirements

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

2. The permittee shall record the average hourly production rate during each operating shift.

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust escaping from the enclosures on the zinc pot and any visible particulate emissions from the stack serving this emissions unit. A record of the necessary and completed corrective actions resulting from the daily checks shall be maintained by the permittee.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any average hourly production rate, on a per shift basis, during which the average hourly production limitation was exceeded, and the actual average hourly production rate for each such shift.

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

3. The permittee shall submit quarterly reports that include the following information:

a. the number of replacement bags, in inventory, for the baghouse modules whenever the number falls below the required 10% inventory; and

b. the number of days between falling below the 10% spare quantity standard and the actual restocking of the filter bags to maintain the 10% spare quantity standard.

4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible emissions of fugitive dust escaping from the enclosures on the zinc pot were observed and/or any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate any abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

1.a Emission Limitation:

20% opacity as a 6-minute average 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 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.b Emission Limitation:

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

Applicable Compliance Method:

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

1.c Emission Limitation:

27.9 lbs/hr of particulate emissions for emissions units P901, P902, and P903, combined

Applicable Compliance Method:

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

1.d Emission Limitation:

259.3 lbs/hr of SO2

Applicable Compliance Method:

SO2 emissions from this emissions unit can only be emitted through the combustion of natural gas in the dryer. The following equation shows maximum emissions from the dryers on all 3 galvanizing lines, combined:

(0.6 pound of SO2/mmBtu)(0.059 mmBtu/hr) = 0.0354 lb/hr of SO2

The SO2 emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.4-2, dated July, 1998.

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

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

b. The 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 test(s) shall be conducted while emissions units P901, P902, and P903 are operating at or near their maximum capacities, 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 appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
36" galvanizing line, a gas-fired dryer, and a hot dip zinc pot controlled by a baghouse	None	None

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: Galvanizing Line No. 2 (P902)

Activity Description: Wean 48" Hot Dip Galvanizing Line with natural gas fired dryers.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
48" galvanizing line, a gas-fired dryer, and a hot dip zinc pot controlled by a baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except for a period of 6 consecutive minutes in a 60-minute period. Visible particulate emissions shall not exceed 60% opacity, as a 6-minute average, at any time.
	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	Reasonably available control measures shall be implemented to minimize or eliminate the visible emissions of fugitive dust. See A.I.2.a through A.I.2.c below.
	OAC rule 3745-17-11(B)(1)	Total combined particulate emissions from emissions units P901, P902, and P903 shall not exceed 27.9 lbs/hr (based on curve P-1 of Figure II).
	OAC rule 3745-18-06	Emissions of sulfur dioxide (SO2) shall not exceed 384.4 lbs/hr.

2. Additional Terms and Conditions

2.a The permittee shall employ reasonable available control measures on the hot dip zinc pot equipment 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 maintaining enclosures of such equipment to ensure compliance. Also, the permittee shall maintain and employ the hoods and ducts over the galvanizing kettle to minimize the headroom and air gaps and ensure that the fumes are captured to the extent possible with good engineering design, in order to minimize or eliminate visible emissions of fugitive dust at the capture location(s). Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.b 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

1. The production rate for this emissions unit shall not exceed 45 tons per hour, or 160 tons per hour combined from emissions units P901, P902, and P903.

2. The pressure drop across each baghouse module shall be maintained within the range of 1.0 to 10.0 inches of water while the emissions unit is in operation.

3. The permittee shall maintain an inventory of replacement bags equal to or greater than 10% of the total number of bags in all baghouse modules. The permittee shall restock filter bags to the 10% spare quantity standard within 30 days of falling below the standard.

III. Monitoring and/or Record Keeping Requirements

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

2. The permittee shall record the average hourly production rate during each operating shift.

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust escaping from the enclosures on the zinc pot and any visible particulate emissions from the stack serving this emissions unit. A record of the necessary and completed corrective actions resulting from the daily checks shall be maintained by the permittee.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any average hourly production rate, on a per shift basis, during which the average hourly production limitation was exceeded, and the actual average hourly production rate for each such shift.

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

3. The permittee shall submit quarterly reports that include the following information:

a. the number of replacement bags, in inventory, for the baghouse modules whenever the number falls below the required 10% inventory; and

b. the number of days between falling below the 10% spare quantity standard and the actual restocking of the filter bags to maintain the 10% spare quantity standard.

4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible emissions of fugitive dust escaping from the enclosures on the zinc pot were observed and/or any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate any abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

1.a Emission Limitation:

20% opacity as a 6-minute average 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 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.b Emission Limitation:

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

Applicable Compliance Method:

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

1.c Emission Limitation:

27.9 lbs/hr of particulate emissions for emissions units P901, P902, and P903, combined

Applicable Compliance Method:

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

1.d Emission Limitation:

384.4 lbs/hr of SO2

Applicable Compliance Method:

SO2 emissions from this emissions unit can only be emitted through the combustion of natural gas in the dryer. The following equation shows maximum emissions from the dryers on all 3 galvanizing lines, combined:

(0.6 pound of SO2/mmBtu)(0.059 mmBtu/hr) = 0.0354 lb/hr of SO2

The SO2 emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.4-2, dated July, 1998.

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

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

b. The 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 test(s) shall be conducted while emissions units P901, P902, and P903 are operating at or near their maximum capacities, 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 appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
48" galvanizing line, a gas-fired dryer, and a hot dip zinc pot controlled by a baghouse	None	None

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: Galvanizing Line No. 3 (P903)

Activity Description: Wean 60" Hot Dip Galvanizing Line with natural gas fired dryers.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
60" galvanizing line, a gas-fired dryer, and a hot dip zinc pot controlled by a baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except for a period of 6 consecutive minutes in a 60-minute period. Visible particulate emissions shall not exceed 60% opacity, as a 6-minute average, at any time.
	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
	OAC rule 3745-17-08(B)	Reasonably available control measures shall be implemented to minimize or eliminate the visible emissions of fugitive dust. See A.I.2.a through A.I.2.c below.
	OAC rule 3745-17-11(B)(1)	Total combined particulate emissions from emissions units P901, P902, and P903 shall not exceed 27.9 lbs/hr (based on curve P-1 of Figure II).
	OAC rule 3745-18-06	Emissions of sulfur dioxide (SO2) shall not exceed 611.6 lbs/hr.

2. Additional Terms and Conditions

2.a The permittee shall employ reasonable available control measures on the hot dip zinc pot equipment 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 maintaining enclosures of such equipment to ensure compliance. Also, the permittee shall maintain and employ the hoods and ducts over the galvanizing kettle to minimize the headroom and air gaps and ensure that the fumes are captured to the extent possible with good engineering design, in order to minimize or eliminate visible emissions of fugitive dust at the capture location(s). Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.b 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

1. The production rate for this emissions unit shall not exceed 90 tons per hour, or 160 tons per hour combined from emissions units P901, P902, and P903.

2. The pressure drop across each baghouse module shall be maintained within the range of 1.0 to 10.0 inches of water while the emissions unit is in operation.

3. The permittee shall maintain an inventory of replacement bags equal to or greater than 10% of the total number of bags in all baghouse modules. The permittee shall restock filter bags to the 10% spare quantity standard within 30 days of falling below the standard.

III. Monitoring and/or Record Keeping Requirements

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

2. The permittee shall record the average hourly production rate during each operating shift.

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust escaping from the enclosures on the zinc pot and any visible particulate emissions from the stack serving this emissions unit. A record of the necessary and completed corrective actions resulting from the daily checks shall be maintained by the permittee.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any average hourly production rate, on a per shift basis, during which the average hourly production limitation was exceeded, and the actual average hourly production rate for each such shift.

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

3. The permittee shall submit quarterly reports that include the following information:

a. the number of replacement bags, in inventory, for the baghouse modules whenever the number falls below the required 10% inventory; and

b. the number of days between falling below the 10% spare quantity standard and the actual restocking of the filter bags to maintain the 10% spare quantity standard.

4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible emissions of fugitive dust escaping from the enclosures on the zinc pot were observed and/or any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate any abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

1.a Emission Limitation:

20% opacity as a 6-minute average 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 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.b Emission Limitation:

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

Applicable Compliance Method:

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

1.c Emission Limitation:

27.9 lbs/hr of particulate emissions for emissions units P901, P902, and P903, combined

Applicable Compliance Method:

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

1.d Emission Limitation:

611.6 lbs/hr of SO2

Applicable Compliance Method:

SO2 emissions from this emissions unit can only be emitted through the combustion of natural gas in the dryer. The following equation shows maximum emissions from the dryers on all 3 galvanizing lines, combined:

(0.6 pound of SO2/mmBtu)(0.059 mmBtu/hr) = 0.0354 lb/hr of SO2

The SO2 emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.4-2, dated July, 1998.

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

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

b. The 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 test(s) shall be conducted while emissions units P901, P902, and P903 are operating at or near their maximum capacities, 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 appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
60" galvanizing line, a gas-fired dryer, and a hot dip zinc pot controlled by a baghouse	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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