

# Statement of Basis For Title V Permit

Version 2. - 3/27/98

Company Name	Youngstown Sinter Company	
Premise Number	0250110886	
Number of Non-insignificant Emissions Units	10	
What makes this facility a Title V facility?	Major for PM, PM10, SO2, NOx, CO and OC	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 3745-77-01 (U)?	Yes	

<b>Part II (State and Federally Enforceable Requirements)</b>			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
A.1.	25-03	N	This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #49, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

- **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

- If there were any "common control" issues associated with this facility, after the table for Part II, provide a summary of those issues and explain how the DAPC decided to resolve them.

**Part III (Requirements Within the State & Federally Enforceable Section)**

EU(s)	Limitation	Basis		OR	M	R	Rp	ET	Misc	Comments
		SIP (3745- )	Other							
F001 paved roadway s and parking areas	no visible particulate emissions except for six minutes during any sixty-minut e observation period	17-07 (B)(4)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.
	reasonably available control measures	17-08 (B), (B)(8), (B)(9)	N	N	Y	Y	Y	N	N	The permittee shall employ reasonably available control measures. The permittee has committed to treat the paved roadways and parking areas by sweeping and flushing at sufficient treatment frequencies to ensure compliance. 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. 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. Emission testing is not required.
F001 unpaved roadway s and parking areas	no visible particulate emissions except for thirteen minutes during any sixty-minut e observation period	17-07 (B)(5)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.

	reasonably available control measures	17-08 (B), (B)(2)	N	N	Y	Y	Y	N	N	<p>The permittee shall employ reasonably available control measures.</p> <p>The permittee has committed to treat the unpaved roadways and parking areas with water or suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance.</p> <p>A maximum speed limit of 15 miles per hour on unpaved roads shall be posted and enforced on the property.</p> <p>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.</p> <p>Emission testing is not required.</p>
F002 load-in and load-out of storage piles	no visible emissions except for thirteen minutes during any sixty-minute observation period	17-07 (B)(6)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.
	reasonably available control measures	17-08 (B), (B)(6)	N	N	Y	Y	Y	N	N	<p>The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with the storage piles.</p> <p>The permittee has committed to the precautionary operating practices of reducing material drop heights from front-end loader buckets and the reduction of storage pile heights. In addition, the raw material has an inherent high moisture content. The sinter product will be treated with sufficient dust suppression chemicals via spray nozzles in the sinter chutes on the stationary conveyor/stacker to control dust emissions during both load-in and load-out operations. These control methods will be supplemented by watering in the ore yard as needed to ensure compliance.</p> <p>Emission testing is not required.</p>
F002 wind erosion from storage piles	no visible emissions except for thirteen minutes during any sixty-minute observation period	17-07 (B)(6)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.

	reasonably available control measures	17-08 (B), (B)(6)	N	N	Y	Y	Y	N	N	The permittee shall employ reasonably available control measures for wind erosion from the surfaces of all storage piles. The permittee has committed to the precautionary operating practices of maintaining low raw material storage pile heights to ensure compliance. In addition, the ore yard raw materials have an inherent high moisture content and the storage piles are wind guard protected by buildings which will reduce wind erosion emissions. These control methods will be supplemented by watering in the ore yard as needed to ensure compliance. Emission testing is not required.
F003 sinter cooler discharge area (sinter cooler discharge conveyor and transfer points) vented to the sinter cooler baghouse	visible particulate emissions of fugitive dust shall not exceed twenty per cent opacity as a six-minute average.	17-07 (B)(3)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.
	visible particulate emissions from the sinter cooler baghouse outlet shall not exceed twenty per cent opacity as a six-minute average.	17-07 (A)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.

<p>minimize or eliminate visible particulate emissions of fugitive dust at the sinter cooler discharge end and the sinter cooler baghouse outlet shall achieve an outlet emission rate of not greater than .030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust outlet, whichever is less stringent.</p>	<p>17-08 (B)(3)</p>	<p>N</p>	<p>Y</p>	<p>Y</p>	<p>Y</p>	<p>Y</p>	<p>Y</p>	<p>Y</p>	<p>N</p>	<p>Baghouse Operational Restrictions - The pressure drop across each baghouse compartment shall be maintained within the range of 0.2 to 2.5 inches of water while the emissions unit is in operation.</p> <p>Baghouse Pressure Drop Monitoring and Recordkeeping Requirements - The permittee shall properly operate, and maintain equipment to monitor the pressure drop across each baghouse compartment while the emissions unit is in operation. The permittee shall record the pressure drop across each baghouse compartment on a daily basis.</p> <p>The permittee shall perform inspections of the sinter cooler discharge end booster fan and fugitive dust capture system. The purpose of the inspections is to ensure that the collection efficiency provided by the booster fan and fugitive dust capture system is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the sinter cooler discharge end to the extent possible with good engineering design.</p> <p>The permittee shall maintain records of the following information:</p> <ol style="list-style-type: none"> <li>a. the date and reason any required inspection was not performed;</li> <li>b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the booster fan or fugitive dust capture system;</li> <li>c. the dates that any repair or maintenance of the booster fan or fugitive dust capture system was performed.</li> </ol> <p>Baghouse Pressure Drop Reporting Requirements - The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across a baghouse compartment did not comply with the allowable range specified above.</p> <p>The permittee shall submit deviation reports that identify any of the following occurrences:</p> <ol style="list-style-type: none"> <li>a. each week during which an inspection was not performed by the required frequency; and</li> <li>b. each instance when maintenance or repair of the booster fan or fugitive dust capture system, that was to be performed as a result of an inspection, was not performed.</li> </ol> <p>The permittee shall conduct, or have conducted, emission testing of the sinter cooler baghouse in accordance with the following requirements:</p> <ol style="list-style-type: none"> <li>a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.</li> <li>b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate(s) for particulate emissions.</li> <li>c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5D of 40 CFR, Part 60, Appendix A.</li> <li>d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.</li> </ol>
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F004 raw material handling operatio ns (convey or and storage bin loading, belt conveyi ng and transfer points)	visible particulate emissions of fugitive dust shall not exceed twenty per cent opacity as a three-minut e average.	17-07 (B)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.
	reasonably available control measures	17-08 (B)	N	N	Y	Y	Y	N	N	The permittee shall employ reasonably available control measures on all raw material load-in and load-out operations including truck unloading, conveyor loading, raw feed material surge bins, screening, mixing, conveying, and transfers associated with raw material handling. The permittee has committed to the precautionary operating practices of reducing raw material drop heights from front-end loader buckets and the maintenance of the existing partial enclosures of the belt conveyors in the raw material storage area. The raw material has an inherent high moisture content. However, chemical dust suppression shall be employed, as needed, at the rotary car dumper loading area and the limestone/dolomite conveyor loading area to control fugitive dust emissions during both load-in and load-out operations. Emission testing is not required.

F005 sinter load-out station (high-line truck load-out station) (temporary storage bins, conveyors and transfer chutes) vented to the high-line sinter load-out station baghouse	visible particulate emissions of fugitive dust shall not exceed twenty per cent opacity as a three-minute average.	17-07 (B)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.
	visible particulate emissions from the high-line sinter load-out station baghouse outlet shall not exceed twenty per cent opacity as a six-minute average.	17-07 (A)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.

	<p>minimize or eliminate visible particulate emissions of fugitive dust at the high-line sinter load-out station and the baghouse outlet shall achieve a particulate emission rate of not greater than .030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust outlet, whichever is less stringent.</p>	<p>17-08 (B)(3)</p>	<p>N</p>	<p>Y</p>	<p>Y</p>	<p>Y</p>	<p>Y</p>	<p>Y</p>	<p>N</p>	<p>Baghouse Operational Restrictions - The pressure drop across the baghouse compartment shall be maintained within the range of 0.2 to 2.5 inches of water while the emissions unit is in operation.</p> <p>Baghouse Pressure Drop Monitoring and Recordkeeping Requirements - The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse compartment while the emissions unit is in operation. The permittee shall record the pressure drop across the baghouse compartment on a daily basis.</p> <p>The permittee shall perform inspections of the high-line sinter load-out station fan and fugitive dust capture system.</p> <p>The purpose of the inspections is to ensure that the collection efficiency provided by the fan and fugitive dust capture system is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the high-line sinter load-out station to the extent possible with good engineering design.</p> <p>The permittee shall maintain records of the following information:</p> <ol style="list-style-type: none"> <li>a. the date and reason any required inspection was not performed;</li> <li>b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the fan or fugitive dust capture system;</li> <li>c. the dates that any repair or maintenance of the fan or fugitive dust capture system was performed.</li> </ol> <p>Baghouse Pressure Drop Reporting Requirements - The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse compartment did not comply with the allowable range specified above.</p> <p>The permittee shall submit deviation reports that identify any of the following occurrences:</p> <ol style="list-style-type: none"> <li>a. each week during which an inspection was not performed by the required frequency; and</li> <li>b. each instance when maintenance or repair of the fan or fugitive dust capture system, that was to be performed as a result of an inspection, was not performed.</li> </ol> <p>If required, the permittee shall conduct, or have conducted, emission testing of the high-line sinter load-out station baghouse in accordance with the following requirements:</p> <ol style="list-style-type: none"> <li>a. The emission testing shall be conducted within 60 days after notification by the Ohio EPA that an emission test is required.</li> <li>b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate for particulate emissions.</li> <li>c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5D of 40 CFR, Part 60, Appendix A.</li> <li>d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.</li> </ol>
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F006 sinter load-out station (ore-yard truck load-out station) (storage bins, conveyo rs, belt-to-b elt transfers and transfer chutes)	visible particulate emissions of fugitive dust shall not exceed twenty per cent opacity as a three-minut e average.	17-07 (B)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.
	reasonably available control measures	17-08 (B)	N	N	Y	Y	Y	N	N	The permittee shall employ reasonably available control measures on all ore-yard sinter load-out station equipment and operations including sinter storage bins, sinter conveyors, belt-to-belt transfers of sinter, sinter transfer chutes and truck loading. The permittee has committed to the maintenance of the existing partial enclosures of the sinter belt conveyors and the application of chemical dust suppression at the ore-yard sinter load-out station belt-to-belt and chute transfer points to control fugitive dust emissions during load-out operations. The permittee may employ other supplemental control measures to ensure compliance. Emission testing is not required.
F007 raw burden (sinter feed) handling (includi ng belt conveyi ng and transfers ) vented to "C" baghous e	visible particulate emissions of fugitive dust shall not exceed twenty per cent opacity as a three-minut e average.	17-07 (B)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.

	<p>visible particulate emissions from the raw burden (sinter feed) handling "C" baghouse stack shall not exceed twenty per cent opacity as a six-minute average.</p>	<p>17-07 (A)</p>	<p>N</p>	<p>Monitoring, record keeping, reporting and emission testing are not required.</p>						
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	<p>minimize or eliminate visible particulate emissions of fugitive dust from raw burden (sinter feed) handling and the "C" baghouse stack shall achieve a particulate emission rate of not greater than .030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack, whichever is less stringent.</p>	<p>17-08 (B)(3)</p>	<p>N</p>	<p>Y</p>	<p>Y</p>	<p>Y</p>	<p>Y</p>	<p>Y</p>	<p>N</p>	<p>Baghouse Operational Restrictions - The pressure drop across the baghouse shall be maintained within the range of 1.0 to 5.0 inches of water while the emissions unit is in operation.</p> <p>Baghouse Pressure Drop Monitoring and Recordkeeping Requirements - The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The permittee shall record the pressure drop across the baghouse on a daily basis.</p> <p>The permittee shall perform inspections of the raw burden (sinter feed) handling fan and fugitive dust capture system. The purpose of the inspections is to ensure that the collection efficiency provided by the fan and fugitive dust capture system is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the raw burden (sinter feed) handling to the extent possible with good engineering design.</p> <p>The permittee shall maintain records of the following information:</p> <ol style="list-style-type: none"> <li>a. the date and reason any required inspection was not performed;</li> <li>b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the fan or fugitive dust capture system;</li> <li>c. the dates that any repair or maintenance of the fan or fugitive dust capture system was performed.</li> </ol> <p>The permittee shall submit deviation reports that identify any of the following occurrences:</p> <ol style="list-style-type: none"> <li>a. each week during which an inspection was not performed by the required frequency; and</li> <li>b. each instance when maintenance or repair of the fan or fugitive dust capture system, that was to be performed as a result of an inspection, was not performed.</li> </ol> <p>Baghouse Pressure Drop Reporting Requirements - The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.</p> <p>If required, the permittee shall conduct, or have conducted, emission testing of the raw burden (sinter feed) handling "C" baghouse in accordance with the following requirements:</p> <ol style="list-style-type: none"> <li>a. The emission testing shall be conducted within 60 days after notification by the Ohio EPA that an emission test is required.</li> <li>b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate for particulate emissions.</li> <li>c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR, Part 60, Appendix A.</li> <li>d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.</li> </ol>
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P001 sinter strand windbox and ignition hood	visible particulate emissions of fugitive dust shall not exceed twenty per cent opacity as a six-minute average.	17-07 (B)(3)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.
	reasonably available control measures	17-08 (B)	N	N	Y	Y	Y	N	N	<p>The use of the primary capture hood, existing enclosure and fan to adequately enclose, contain, capture and vent particulate emissions of fugitive dust from the sinter strand windbox and ignition hood to the sinter strand windbox baghouse. Such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the sinter strand windbox and ignition hood to the extent possible with good engineering design.</p> <p>The permittee shall perform inspections of the sinter strand windbox and ignition hood fan and fugitive dust capture system. The purpose of the inspections is to ensure that the collection efficiency provided by the fan and fugitive dust capture system is sufficient to minimize or eliminate visible particulate emissions of fugitive dust at the sinter strand windbox and ignition hood to the extent possible with good engineering design.</p> <p>The permittee shall maintain records of the following information:</p> <ul style="list-style-type: none"> <li>a. the date and reason any required inspection was not performed;</li> <li>b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the fan or fugitive dust capture system;</li> <li>c. the dates that any repair or maintenance of the fan or fugitive dust capture system was performed.</li> </ul> <p>The permittee shall submit deviation reports that identify any of the following occurrences:</p> <ul style="list-style-type: none"> <li>a. each week during which an inspection was not performed by the required frequency; and</li> <li>b. each instance when maintenance or repair of the fan or fugitive dust capture system, that was to be performed as a result of an inspection, was not performed.</li> </ul>

	visible particulate emissions from the sinter machine strand windbox stack shall not exceed twenty per cent opacity as a six-minute average.	17-07 (A)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.
	particulate matter emissions from the sinter machine strand windbox stack shall not exceed 50 pounds per hour.	17-11	N	Y	Y	Y	Y	Y	Y	<p>Baghouse Operational Restrictions - The pressure drop across the baghouse shall be maintained within the range of 7.0 to 14.0 inches of water while the emissions unit is in operation.</p> <p>Baghouse Pressure Drop Monitoring and Recordkeeping Requirements - The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The permittee shall record the pressure drop across the baghouse on a once per shift basis.</p> <p>Baghouse Pressure Drop Reporting Requirements - The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.</p> <p>The permittee shall conduct, or have conducted, emission testing of the sinter machine strand windbox in accordance with the following requirements:</p> <ol style="list-style-type: none"> <li>The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.</li> <li>The emission testing shall be conducted to demonstrate compliance with the allowable emission rate for particulate emissions.</li> <li>The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 5 of 40 CFR, Part 60, Appendix A.</li> <li>The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.</li> </ol>

	sulfur dioxide emissions from the sinter machine strand windbox stack shall not exceed 3.3 pounds of sulfur dioxide per ton of process weight.	18-56 (H)	N	N	Y	Y	Y	Y	N	<p>NEW - SO2 [OAC rule 3745-18-56(H)] adopted by OEPA, effective 03/17/99; SIP revision package submitted to USEPA - Region V, May, 1999. The old SIP limit, which was not federally approved, and the FIP will not apply to this emissions unit when the new SIP limit is approved by USEPA. The new SIP limit has been technically approved by USEPA.</p> <p>There are requirements for the sampling and sulfur analysis of sinter burden material, sinter product and strand windbox baghouse dust.</p> <p>There are recordkeeping requirements for sinter burden material (process weight), sinter production and sulfur quality.</p> <p>Recordkeeping Requirements for the Calculated Monthly Average Sulfur Dioxide Emissions Rate - The permittee shall maintain monthly records of the average sulfur dioxide emissions rate.</p> <p>There are reporting requirements for sinter burden material (process weight), sinter production, sulfur quality data and the average sulfur dioxide emissions rate [pounds sulfur dioxide/ton of process weight (sinter burden material)] from the sinter strand windbox stack.</p> <p>The permittee shall conduct, or have conducted, emission testing of the sinter machine strand windbox in accordance with the following requirements:</p> <ol style="list-style-type: none"> <li>a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.</li> <li>b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate for sulfur dioxide.</li> <li>c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 6 of 40 CFR, Part 60, Appendix A.</li> <li>d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.</li> </ol>
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P002 sinter coolers A, B, C and D	visible particulate emissions of fugitive dust shall not exceed twenty per cent opacity as a six-minute average.	17-07 (B)(3)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.
	reasonably available control measures	17-08 (B)	N	N	Y	Y	Y	N	N	<p>The use of the existing enclosure and fans to adequately enclose, contain, capture and vent particulate emissions of fugitive dust from sinter cooler A to the sinter strand and particulate emissions of fugitive dust from sinter coolers B, C and D to the sinter cooler baghouse. Such equipment shall be sufficient to minimize or eliminate visible particulate emissions of fugitive dust from sinter coolers A, B, C and D to the extent possible with good engineering design</p> <p>The permittee shall perform inspections of the sinter coolers A, B, C and D fans and fugitive dust capture systems. The purpose of the inspections is to ensure that the collection efficiency provided by the fans and fugitive dust capture systems are sufficient to minimize or eliminate visible particulate emissions of fugitive dust from sinter coolers A, B, C and D to the extent possible with good engineering design.</p> <p>The permittee shall maintain records of the following information:</p> <ol style="list-style-type: none"> <li>a. the date and reason any required inspection was not performed;</li> <li>b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the fans or fugitive dust capture systems;</li> <li>c. the dates that any repair or maintenance of the fans or fugitive dust capture systems was performed.</li> </ol> <p>The permittee shall submit deviation reports that identify any of the following occurrences:</p> <ol style="list-style-type: none"> <li>a. each week during which an inspection was not performed by the required frequency; and</li> <li>b. each instance when maintenance or repair of the fans or fugitive dust capture systems, that was to be performed as a result of an inspection, was not performed.</li> </ol> <p>.</p>

	particulate matter emissions from the sinter coolers A, B, C and D shall not exceed 42.93 pounds per hour.	17-11	N	Y	Y	Y	Y	Y	N	<p>Baghouse Operational Restrictions - The pressure drop across each baghouse compartment shall be maintained within the range of 0.2 to 2.5 inches of water while the emissions unit is in operation.</p> <p>Baghouse Pressure Drop Monitoring and Recordkeeping Requirements - The permittee shall properly operate, and maintain equipment to monitor the pressure drop across each baghouse compartment while the emissions unit is in operation. The permittee shall record the pressure drop across each baghouse compartment on a daily basis.</p> <p>Baghouse Pressure Drop Reporting Requirements - The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across a baghouse compartment did not comply with the allowable range specified above.</p> <p>The permittee shall conduct, or have conducted, emission testing of the sinter cooler baghouse in accordance with the following requirements:</p> <ol style="list-style-type: none"> <li>The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.</li> <li>The emission testing shall be conducted to demonstrate compliance with the allowable emission rate(s) for particulate emissions.</li> <li>The following test method shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5D of 40 CFR, Part 60, Appendix A.</li> <li>The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.</li> </ol>
P002 sinter cooler baghouse (sinter coolers B, C and D)	visible particulate emissions from the sinter cooler baghouse shall not exceed twenty percent opacity as a six-minute average.	17-07 (A)	N	N	N	N	N	N	N	Monitoring, record keeping, reporting and emission testing are not required.

<p>P901 sintering discharge end and raw material / fines surge bins (sinter machine discharge end and associated finished sinter conveyor or transfer points, sinter burden (raw mix feed) and sinter fines surge bins and associated conveyor or transfer points) vented to "A" baghouse</p>	<p>visible particulate emissions from the sintering discharge end and raw material/ fines surge bins "A" baghouse stack shall not exceed twenty percent opacity as a six-minute average.</p>	<p>17-07 (A)</p>	<p>N</p>	<p>Monitoring, record keeping, reporting and emission testing are not required.</p>							
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	<p>particulate matter emissions from the sintering discharge end and raw material/fines surge bins "A" baghouse shall not exceed 50 pounds per hour.</p>	17-11	N	Y	Y	Y	Y	Y	N	<p>Baghouse Operational Restrictions - The pressure drop across the baghouse shall be maintained within the range of 4.0 to 9.0 inches of water while the emissions unit is in operation.</p> <p>Baghouse Pressure Drop Monitoring and Recordkeeping Requirements - The permittee shall properly operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The permittee shall record the pressure drop across the baghouse on a once per shift basis.</p> <p>Baghouse Pressure Drop Reporting Requirements - The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.</p> <p>The permittee shall conduct, or have conducted, emission testing of the sintering discharge end and raw material/fines surge bins "A" baghouse in accordance with the following requirements:</p> <ol style="list-style-type: none"> <li>a. The emission testing shall be conducted within 3 months after issuance of this permit and within 6 months prior to permit renewal.</li> <li>b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate(s) for particulate emissions.</li> <li>c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate(s): Method 5 of 40 CFR, Part 60, Appendix A.</li> <li>d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.</li> </ol>
	<p>visible particulate emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.</p>	17-07 (B)	N	N	N	N	N	N	N	<p>Monitoring, record keeping, reporting and emission testing are not required.</p>

minimize or eliminate visible particulate emissions of fugitive dust from the sintering discharge end and raw material/ fines surge bins to the extent possible with good engineering design.	17-08 (B)	N	N	Y	Y	Y	N	N	N	<p>The permittee shall perform inspections of the sintering discharge end and raw material / fines surge bins fan and fugitive dust capture system. The purpose of the inspections is to ensure that the collection efficiency provided by the fan and fugitive dust capture system is sufficient to minimize or eliminate visible particulate emissions of fugitive dust from sintering discharge end and raw material / fines surge bins to the extent possible with good engineering design.</p> <p>The permittee shall maintain records of the following information:</p> <ol style="list-style-type: none"> <li>a. the date and reason any required inspection was not performed;</li> <li>b. the date of each inspection where it was determined by the permittee that it was necessary to perform maintenance or repair the fan or fugitive dust capture system;</li> <li>c. the dates that any repair or maintenance of the fan or fugitive dust capture system was performed.</li> </ol> <p>The permittee shall submit deviation reports that identify any of the following occurrences:</p> <ol style="list-style-type: none"> <li>a. each week during which an inspection was not performed by the required frequency; and</li> <li>b. each instance when maintenance or repair of the fan or fugitive dust capture system, that was to be performed as a result of an inspection, was not performed.</li> </ol>
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EU = emissions unit id

OR = operational restriction

M = monitoring requirements

R = recordkeeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

• **Instructions for Part III:**

- All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. If the basis for the term and condition is “Other,” an explanation of the basis must be provided in the “Comments” section.

To complete the remainder of the table after “Basis,” except for the “Comments” section, simply specify a “Y” for yes or an “N” for no. For the “M”, “R”, “Rp” and “ET” columns, if “N” is specified, there should be a brief explanation in the “Comments” section as to why there are no requirements. Also, if a “Y” is noted under “OR” or “Misc,” an explanation of the requirements should be provided in the “Comments” section. In addition to a general

explanation of the “OR” and/or “Misc,” the following should be provided:

1. For an operational restriction, clarify if appropriate monitoring, recordkeeping, reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the “Miscellaneous Requirements” section of the permit, provide an explanation in the “Comments” section of the violation, basis for the violation, and the company’s proposed control plan and schedule.
3. If superseding language is included in the “Miscellaneous Requirements” section of the permit, explain which requirements are being superseded and which requirements are being superseded on the State-only side of the permit and why they are on the State-only side.

An explanation is not required if an “N” is noted in the “OR” column or in the “Misc” column.

- Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in a paragraph following the table for Part III.