



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

# TITLE V/STATE OPERATING PERMIT

Issue Date: March 11, 2020 Effective Date: March 15, 2020

Expiration Date: March 11, 2025

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 63-00027

Federal Tax Id - Plant Code: 20-2635976-1

	Owner Information
Name: J	JESSOP STEEL LLC
Mailing Address: 1	100 RIVER RD
E	BRACKENRIDGE, PA 15014-1537
	Plant Information

Plant: JESSOP STEEL LLC/WASHINGTON PLT

Location: 63 Washington County 63003 Washington City

SIC Code: 3316 Manufacturing - Cold Finishing Of Steel Shapes

Responsible Official

Name: DEBORAH CALDERAZZO

Title: DIR ENV AFFAIRS Phone: (724) 226 - 5947

# **Permit Contact Person**

Name: DEBORAH L CALDERAZZO

Title: DIR ENV AFFAIRS Phone: (724) 226 - 5947

[Signature]	 	 	 	 	 	

MARK R. GOROG, P.E., ENVIRONMENTAL PROGRAM MANAGER, SOUTHWEST REGION



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# SECTION A. Site Inventory List

Source ID         Source Name         Capacity/Throughput           031         MIURA BOILERS 1& 2 RATED AT 3.94 MMBTU/ HR EACH         3.940 MMBTU/HR           220         MISC SPACE HEATERS         102 SHOT-BLAST           110         110" MILL HEATING FURNACES 1-7	Fuel/Material
EACH 220 MISC SPACE HEATERS 102 SHOT-BLAST	
220 MISC SPACE HEATERS 102 SHOT-BLAST	
102 SHOT-BLAST	
LIO VIILL FEATING FURNACES 1-7	
126 PICKLING DEPT	
127 PRODUCTION BURNING	
130 GRINDING MACHINES 1 & 2	
140 BAR MILL ANNEALING FURNACES 3, 4, 5, 7-17	
150 S.W.S.L. 400" ANNEALING FURNACE	
160 D.W.S.L. 400" ANNEALING FURNACE	
170 PARTS CLEANERS	
180 OLSON 110" MILL REHEAT FURNACE (# 8)	
181 LOI 110" MILL REHEAT FURNACE (# 9) 26.100 MMBTU/HR	
210 COOLING TOWERS	
230 VEHICLE TRAVEL (PAVED ROADS)	
250 CHARGE FIRE FURNACE (# 10) 22.000 MMBTU/HR	
260 HYBRID ANNEAL FURNACE 34.800 MMBTU/HR	
C102 SHOTBLAST DUSTCOLLECTOR (11,100 ACFM)	
C127 POWDER BURNING BENCH BAGHOUSE (35,000)	
C130A GRINDING BENCH 1 BAGHOUSE (50,000 ACFM)	
C130B GRINDING BENCH 2 BAGHOUSE (50,000ACFM)	
S031 BOILERS STACK	
S102 SHOTBLAST	
S110A STACK	
S110B STACK	
S110C STACK	
S110D STACK	
S110E STACK	
S110F STACK	
S110G STACK	
S127 POWDER BURNING BENCHES(3)	
S130A NO.1 GRINDER	
S130B NO.2 GRINDER	
S250 STACK	
S260 STACK	
Z126 EXHAUST	
Z150 EXHAUST	
Z160 EXHAUST	
Z170 EXHAUST	
Z180 EXHAUST	

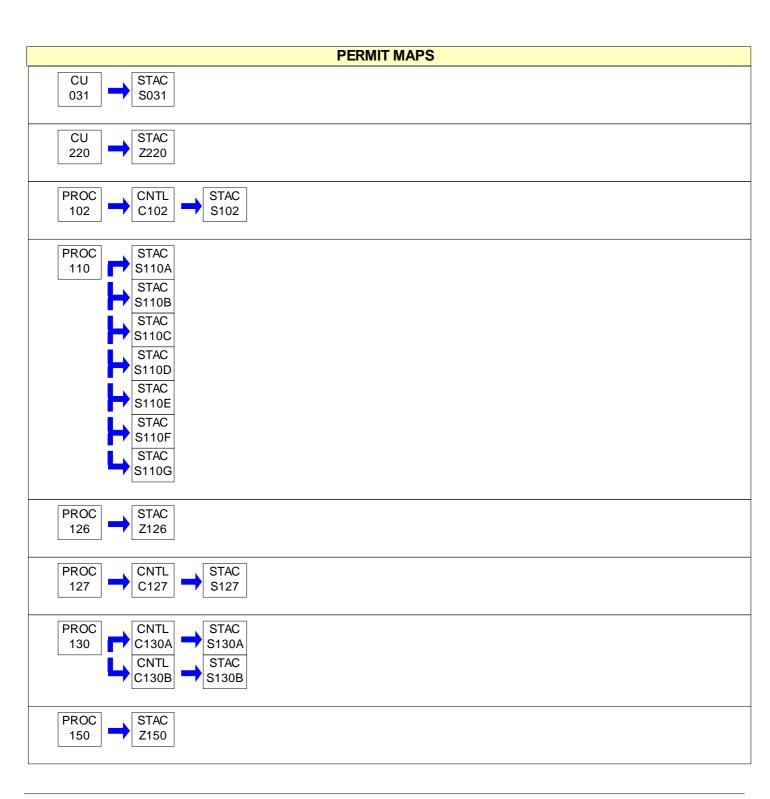




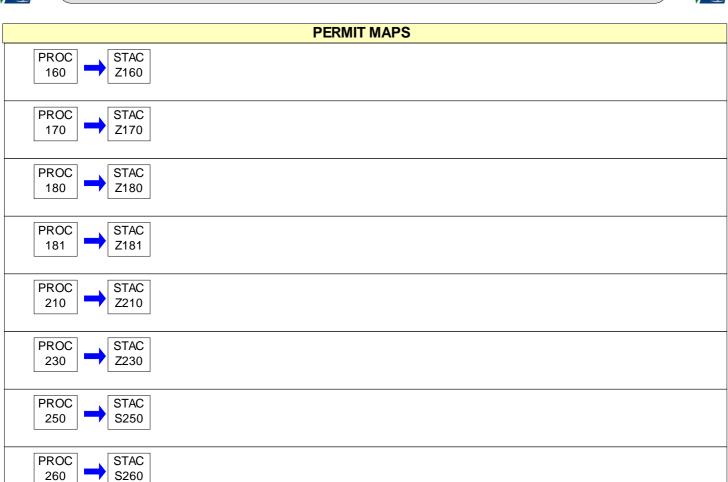
#### **SECTION A. Site Inventory List**

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Source I	D Source Name	Capacity/Throughput	Fuel/Material
Z181	EXHAUST		
Z210	EXHAUST		
Z220	SPACE HEATERS		
Z230	EXHAUST		











# JESSOP STEEL LLC/WASHINGTON PLT

# **SECTION B.** General Title V Requirements

#001 [25 Pa. Code § 121.1]

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**Definitions** 

Words and terms that are not otherwise defined in this permit shall have the meanings set forth in Section 3 of the Air Pollution Control Act (35 P.S. § 4003) and 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 121.7]

**Prohibition of Air Pollution** 

No person may permit air pollution as that term is defined in the act.

#003 [25 Pa. Code § 127.512(c)(4)]

**Property Rights** 

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

#004 [25 Pa. Code § 127.446(a) and (c)]

## **Permit Expiration**

This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit. The terms and conditions of the expired permit shall automatically continue pending issuance of a new Title V permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]

#### **Permit Renewal**

- (a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.
- (b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.
- (c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).
- (d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

#006 [25 Pa. Code §§ 127.450(a)(4) & 127.464(a)]

# **Transfer of Ownership or Operational Control**

- (a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:
  - (1) The Department determines that no other change in the permit is necessary;
- (2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,
- (3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.

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(b) In accordance with 25 Pa. Code § 127.464(a), this permit may not be transferred to another person except in cases of transfer-of-ownership which are documented and approved to the satisfaction of the Department.

#### #007 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]

# **Inspection and Entry**

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- (a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
  - (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.
- (b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.
- (c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#### #008 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]

## **Compliance Requirements**

- (a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:
  - (1) Enforcement action
  - (2) Permit termination, revocation and reissuance or modification
  - (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

#### #009 [25 Pa. Code § 127.512(c)(2)]

## Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a 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 conditions of this permit.

#### #010 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]

# **Duty to Provide Information**

(a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or





to determine compliance with the permit.

(b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

# #011 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

# Reopening and Revising the Title V Permit for Cause

- (a) This Title V permit may be modified, revoked, reopened and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay a permit condition.
- (b) This permit may be reopened, revised and reissued prior to expiration of the permit under one or more of the following circumstances:
- (1) Additional applicable requirements under the Clean Air Act or the Air Pollution Control Act become applicable to a Title V facility with a remaining permit term of three (3) or more years prior to the expiration date of this permit. The Department will revise the permit as expeditiously as practicable but not later than 18 months after promulgation of the applicable standards or regulations. No such revision is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or its terms and conditions has been extended.
- (2) Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator of EPA, excess emissions offset plans for an affected source shall be incorporated into the permit.
- (3) The Department or the EPA determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
- (4) The Department or the Administrator of EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (c) Proceedings to revise this permit shall follow the same procedures which apply to initial permit issuance and shall affect only those parts of this permit for which cause to revise exists. The revision shall be made as expeditiously as practicable.
- (d) Regardless of whether a revision is made in accordance with (b)(1) above, the permittee shall meet the applicable standards or regulations promulgated under the Clean Air Act within the time frame required by standards or regulations.

# #012 [25 Pa. Code § 127.543]

#### Reopening a Title V Permit for Cause by EPA

As required by the Clean Air Act and regulations adopted thereunder, this permit may be modified, reopened and reissued, revoked or terminated for cause by EPA in accordance with procedures specified in 25 Pa. Code § 127.543.

# #013 [25 Pa. Code § 127.522(a)]

# Operating Permit Application Review by the EPA

The applicant may be required by the Department to provide a copy of the permit application, including the compliance plan, directly to the Administrator of the EPA. Copies of title V permit applications to EPA, pursuant to 25 PA Code §127.522(a), shall be submitted, if required, to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

# #014 [25 Pa. Code § 127.541]

# **Significant Operating Permit Modifications**

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with

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25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

# #015 [25 Pa. Code §§ 121.1 & 127.462]

# **Minor Operating Permit Modifications**

The permittee may make minor operating permit modifications (as defined in 25 Pa. Code §121.1), on an expedited basis, in accordance with 25 Pa. Code §127.462 (relating to minor operating permit modifications). Notifications to EPA, pursuant to 25 PA Code §127.462(c), if required, shall be submitted, to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

## #016 [25 Pa. Code § 127.450]

## **Administrative Operating Permit Amendments**

(a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code §127.450(a). Copies of request for administrative permit amendment to EPA, pursuant to 25 PA Code §127.450(c)(1), if required, shall be submitted to the following EPA e-mail box:

R3\_Air\_Apps\_and\_Notices@epa.gov

Please place the following in the subject line: TV [permit number], [Facility Name].

(b) Upon final action by the Department granting a request for an administrative operating permit amendment covered under §127.450(a)(5), the permit shield provisions in 25 Pa. Code § 127.516 (relating to permit shield) shall apply to administrative permit amendments incorporated in this Title V Permit in accordance with §127.450(c), unless precluded by the Clean Air Act or the regulations thereunder.

# #017 [25 Pa. Code § 127.512(b)]

# **Severability Clause**

The provisions of this permit are severable, and if any provision of this permit is determined by the Environmental Hearing Board or a court of competent jurisdiction, or US EPA to be invalid or unenforceable, such a determination will not affect the remaining provisions of this permit.

# #018 [25 Pa. Code §§ 127.704, 127.705 & 127.707]

# **Fee Payment**

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).





- (e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.
- (f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

# #019 [25 Pa. Code §§ 127.14(b) & 127.449]

#### **Authorization for De Minimis Emission Increases**

- (a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:
  - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

The Department may disapprove or condition de minimis emission increases at any time.

- (b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
  - (4) Space heaters which heat by direct heat transfer.



- (5) Laboratory equipment used exclusively for chemical or physical analysis.
- (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.
- (e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

# #020 [25 Pa. Code §§ 127.11a & 127.215]

# **Reactivation of Sources**

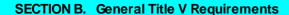
- (a) The permittee may reactivate a source at the facility that has been out of operation or production for at least one year, but less than or equal to five (5) years, if the source is reactivated in accordance with the requirements of 25 Pa. Code §§ 127.11a and 127.215. The reactivated source will not be considered a new source.
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

# #021 [25 Pa. Code §§ 121.9 & 127.216]

#### Circumvention

- (a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.
- (b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department,





the device or technique may be used for control of malodors.

## #022 [25 Pa. Code §§ 127.402(d) & 127.513(1)]

#### **Submissions**

(a) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

Regional Air Program Manager
PA Department of Environmental Protection
(At the address given on the permit transmittal letter, or otherwise notified)

(b) Any report or notification for the EPA Administrator or EPA Region III should be addressed to:

Office of Air Enforcement and Compliance Assistance (3AP20)
United States Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

(c) An application, form, report or compliance certification submitted pursuant to this permit condition shall contain certification by a responsible official as to truth, accuracy, and completeness as required under 25 Pa. Code § 127.402(d). Unless otherwise required by the Clean Air Act or regulations adopted thereunder, this certification and any other certification required pursuant to this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

# #023 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]

#### Sampling, Testing and Monitoring Procedures

- (a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

# #024 [25 Pa. Code §§ 127.511 & Chapter 135]

# **Recordkeeping Requirements**

- (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:
  - (1) The date, place (as defined in the permit) and time of sampling or measurements.
  - (2) The dates the analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of the analyses.
  - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

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(c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

#### #025 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

# **Reporting Requirements**

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- (a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.
- (b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.
- (c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #022(c) of this permit.
- (d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#### #026 [25 Pa. Code § 127.513]

## **Compliance Certification**

- (a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:
  - (1) The identification of each term or condition of the permit that is the basis of the certification.
  - (2) The compliance status.
  - (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
  - (4) Whether compliance was continuous or intermittent.
- (b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department and EPA in accordance with the submission requirements specified in condition #022 of this section.

#### [25 Pa. Code § 127.3] #027

## **Operational Flexibility**

The permittee is authorized to make changes within the Title V facility in accordance with the following provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements of Section 502(b)(10) of the Clean Air Act and Section 6.1(i) of the Air Pollution Control Act:

(1) Section 127.14 (relating to exemptions)

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- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

# #028 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]

## **Risk Management**

- (a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).
- (b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:
  - (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
  - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
  - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.
- (2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.
- (3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.
- (c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
- (d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:
- (1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,
- (2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.
- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
  - (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

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(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #26 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#### #029 [25 Pa. Code § 127.512(e)]

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## Approved Economic Incentives and Emission Trading Programs

No permit revision shall be required under approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this Title V permit.

#### #030 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]

#### **Permit Shield**

- (a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:
  - (1) The applicable requirements are included and are specifically identified in this permit.
- (2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.
- (b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.
  - (2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.
  - (4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.
- (c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department incorporating a significant permit modification in this Title V Permit shall be covered by the permit shield at the time that the permit containing the significant modification is issued.

#### #031 [25 Pa. Code §135.3]

# Reporting

- (a) The permittee shall submit by March 1 of each year an annual emissions report for the preceding calendar year. The report shall include information for all active previously reported sources, new sources which were first operated during the preceding calendar year, and sources modified during the same period which were not previously reported. All air emissions from the facility should be estimated and reported.
- (b) A source owner or operator may request an extension of time from the Department for the filing of an annual emissions report, and the Department may grant the extension for reasonable cause.

#### #032 [25 Pa. Code §135.4]

# **Report Format**

Emissions reports shall contain sufficient information to enable the Department to complete its emission inventory. Emissions reports shall be made by the source owner or operator in a format specified by the Department.

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#### I. RESTRICTIONS.

# **Emission Restriction(s).**

# # 001 [25 Pa. Code §121.7]

#### Prohibition of air pollution.

No person may permit air pollution as that term is defined in the act.

## # 002 [25 Pa. Code §123.1]

## Prohibition of certain fugitive emissions

- (a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:
  - (1) Construction or demolition of buildings or structures.
  - (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
  - (4) Clearing of land.
  - (5) Stockpiling of materials.
- (6) Sources and classes of sources other than those identified in paragraphs (1)-(5), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
  - (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

#### # 003 [25 Pa. Code §123.2]

# Fugitive particulate matter

The permittee may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section C, Condition #001, if the emissions are visible at the point the emissions pass outside the person's property.

## # 004 [25 Pa. Code §123.31]

#### Limitations

The permittee shall not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.

# # 005 [25 Pa. Code §123.41]

# Limitations

The permittee shall not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either of the following:

- (1) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour.
- (2) Equal to or greater than 60% at any time.

# # 006 [25 Pa. Code §123.42]

## **Exceptions**

The emission limitations of 25 Pa. Code Section 123.41 shall not apply when:

(1) The presence of uncombined water is the only reason for failure of the emission to meet the limitations;

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- (2) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions;
- (3) The emission results from sources specified in 25 Pa. Code Section 123.1(a)(1)-(9).

# # 007 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

In accordance with RACT Operating Permit 63-000-027, Condition No.6, VOC emissions from this facility shall not exceed 4.4 tons for RACT affected emission units, in any 12 month consecutive period.RACT affected emission units are:

110 - 110" Mill Heating Furnaces 1-7

180 - 110" Mill Oslon reheat Furnace (# 8)

140 - Bar Mill Annealing Furnaces

160 - 400" D.W. Annealing Furnace

150 - 400" S.W. Annealing Furnace

126 - Batch pickling.

## # 008 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

All air cleaning devices and air contamination sources at the facility shall be operated and maintained in accordance with manufacturer's specification and good air pollution and engineering practices.

# # 009 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

As established in RACT Operating Permit 63-000-027, Condition No.13, reductions in the allowable emission rates below the levels established therein shall not be available as Emission Reduction Credits (ERC's) pursuant to 25 PA Code Ch. 127.206 unless the reductions are achieved through real reductions in actual or allowable emissions, whichever is lower, and unless the reductions are achieved through the installation of controls beyond those required by RACT or any other subsequent regulatory requirement.

# # 010 [25 Pa. Code §127.441]

#### Operating permit terms and conditions.

In accordance with RACT Operating Permit 63-000-027, Condition No.5, NOx emissions from this facility shall not exceed 179 tons for RACT affected emission units, in any 12 month consecutive period. RACT affected emission units are:

110 - 110" Mill Heating Furnaces 1-7

180 - 110" Mill Oslon reheat Furnace (# 8)

140 - Bar Mill Annealing Furnaces

160 - 400" D.W. Annealing Furnace

150 - 400" S.W. Annealing Furnace

126 - Batch pickling.

# # 011 [25 Pa. Code §127.444]

# Compliance requirements.

A person may not cause or permit the operation of a source subject to this article unless the source and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the application and conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

# # 012 [25 Pa. Code §129.14]

# Open burning operations

- (a) The permittee shall not permit the open burning of material in a manner that:
- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.



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- (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
  - (3) The emissions interfere with the reasonable enjoyment of life or property.
  - (4) The emissions cause damage to vegetation or property.
  - (5) The emissions are or may be deleterious to human or animal health.
  - (b) Exceptions: The requirements of subsection (a) do not apply where the open burning operations result from:
- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
  - (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
  - (c) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:
    - (1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

- (2) Subsection (a) notwithstanding, clearing and grubbing wastes may be burned subject to the following requirements:
- (i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b) of this section.
- (ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes that have been transported.

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

# III. MONITORING REQUIREMENTS.

# # 013 [25 Pa. Code §123.43]

# **Measuring techniques**

Visible emissions may be measured using either of the following:

- (1) A device approved by the Department and maintained to provide accurate opacity measurements.
- (2) Observers, trained and qualified, to measure plume opacity with the naked eye or with the aid of any devices approved by the Department.

# # 014 [25 Pa. Code §127.511]

## Monitoring and related recordkeeping and reporting requirements.

A facility-wide inspection shall be conducted by the Owner/Operator, at a minimum of once each day, that the facility is in operation. The facility-wide inspection shall be conducted for the presence of the following:



- a. Visible stack emissions;
- b. Fugitive emissions; and
- c. Potentially objectionable odors at the property line.

These observations are to ensure continued compliance with source-specific visible emission limitations, fugitive emissions prohibited under 25 Pa. Code §§123.1 or 123.2, and malodors prohibited under 25 Pa. Code §123.31. This observation does not require that it be performed by a person certified as a qualified observer for EPA Method 9 for Visual Determination of the Opacity of Emissions from Stationary Sources. Observations for visible stack emissions shall be conducted during daylight hours and all observations shall be conducted while sources are in operation. If visible stack emissions, fugitive emissions, or potentially objectionable odors are apparent, the Owner/Operator shall take corrective action.

# IV. RECORDKEEPING REQUIREMENTS.

#### # 015 [25 Pa. Code §127.511]

#### Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain records observations performed of visible stack emissions; fugitive emissions; and potentially objectionable odors at the property line. These records shall include the date, time, name and title of the observer, incidents where the stack opacity of the respective sources equals or exceeds 20 percent or any other applicable opacity standard and any action taken as a result of these opacity observations.

# # 016 [25 Pa. Code §129.95]

# Recordkeeping

In accordance with RACT Operating Permit 63-000-027, Condition No.10, the Owner/Operator shall maintain records in accordance with 25 PA Code Ch. 129.95. At a minimum, the following records shall be kept at the facility: monthly natural gas consumption and steel production. These records shall be maintained on file for not less than five years and shall be made available to the Department upon request.

# # 017 [25 Pa. Code §135.5]

## Recordkeeping

Source owners or operators shall maintain and make available upon request by the Department records including computerized records that may be necessary to comply with 135.21 (relating to reporting; and emission statements). These may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

# V. REPORTING REQUIREMENTS.

# # 018 [25 Pa. Code §135.21]

# **Emission statements**

- (a) The owner or operator shall provide the Department with a statement, in a form as the Department may prescribe, for classes or categories of sources, showing the actual emissions of oxides of nitrogen and VOCs from that source for each reporting period, a description of the method used to calculate the emissions and the time period over which the calculation is based. The statement shall contain a certification by a company officer or the plant manager that the information contained in the statement is accurate.
- (b) Annual emission statements are due by March 1 for the preceding calendar year beginning with March 1, 1993 for calendar year 1992. Statements shall provide data consistent with requirements and guidance developed by the EPA. The quidance is available from:

United States Environmental Protection Agency 401 M. Street, S.W. Washington, D.C. 20460





- (c) The Department may require more frequent submittals upon determination of one or more of the following applies:
  - (1) A more frequent submission is required by the EPA.
  - (2) Analysis of the data on a more frequent basis is necessary to implement the requirements of the Act.

#### # 019 [25 Pa. Code §135.3] Reporting

The owner or operator shall submit by March 1 of each year, a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same period which were not previously reported.

The source owner or operator may request an extension of time from the Department for the filing of a source report, and the Department may grant the extension for reasonable cause.

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 020 [25 Pa. Code §123.1]

# Prohibition of certain fugitive emissions

For any source specified in Section C, Condition #001, the permittee shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads or the clearing of land.
- (2) Application of asphalt, oil, or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

#### ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

#### VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this permit including Section B (relating to Title V General Requirements).

# IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.





Source ID: 031 Source Name: MIURA BOILERS 1 & 2 RATED AT 3.94 MMBTU/ HR EACH

Source Capacity/Throughput: 3.940 MMBTU/HR

CU | STAC | S031

#### I. RESTRICTIONS.

# **Emission Restriction(s).**

# 001 [25 Pa. Code §123.11]

#### **Combustion units**

The permittee shall not permit the emission into the outdoor atmosphere of particulate matter from these boilers in excess of the rate of 0.4 pounds per million Btu of heat input.

# 002 [25 Pa. Code §123.22]

#### **Combustion units**

The permittee shall not permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO2, from these combustion units in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

Compliance with this requirement specified in this streamline permit condition assures compliance with the provisions specified in the S.I.P. approved SO2 limits found in 40 CFR 52.202(c)(1).

# 003 [25 Pa. Code §129.93]

# **Presumptive RACT emission limitations**

In accordance with 25 Pa. Code Ch. 129.93(c)(1), the permittee shall install, maintain and operate these boilers with individual rated gross heat inputs less than twenty (20) million Btu/hour of operation, in accordance with the manufacturers specifications.

# II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## III. MONITORING REQUIREMENTS.

# 004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

At a minimum, the permittee shall verify SO2 emission rates using the most current AP-42 emission factors in conjunction with fuel usage records.

# 005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

At a minimum, the permittee shall verify particulate matter emission rates using the most current AP-42 emission factors in conjunction with fuel usage records.

#### IV. RECORDKEEPING REQUIREMENTS.

# 006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The Owner/Operator shall maintain records containing at a minimum, a Certification of sulfur content in the natural gas utilized in these boilers.







## REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

#### WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

#### VII. ADDITIONAL REQUIREMENTS.

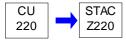
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).



# **SECTION D.** Source Level Requirements

Source ID: 220 Source Name: MISC SPACE HEATERS

Source Capacity/Throughput:



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

#### IV. RECORDKEEPING REQUIREMENTS.

# 001 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The Owner/Operator shall maintain records of all natural gas utilized in these space heaters.

# 002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The Owner/Operator shall maintain records containing at a minimum, a Certification of sulfur content of all fuel oil and a Certification of sulfur content of natural gas utilized in these space heaters.

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

# VI. WORK PRACTICE REQUIREMENTS.

# 003 [25 Pa. Code §129.93]

# **Presumptive RACT emission limitations**

In accordance with 25 Pa. Code Ch. 129.93(c)(1), the permittee shall install, maintain and operate these space heaters with individual rated gross heat inputs less than twenty (20) million Btu/hour of operation, in accordance with the manufacturers specifications.

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).



# **SECTION D.** Source Level Requirements

Source ID: 102 Source Name: SHOT-BLAST

Source Capacity/Throughput:

Conditions for this source occur in the following groups: MECH. PROCESSES



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

# # 001 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.2] Sections of PART 64

# **Applicability**

For Compliance Assurance Monitoring (CAM), the permittee will monitor for the presence of visible emissions from the Shot Blast dust collector exhaust to demonstrate a reasonable assurance that the dust collector controls particulate matter to levels in compliance with the emissions restrictions in this permit.

- 1. Indicator: Visible Emissions Monitoring
- (a) Measurement Approach:

Stack exhaust will be observed on a routine basis to determine if visible emissions are present.

(b) Indicator Range:

Exhaust condition will be determined to be "normal" (abnormal visible emissions are not present) or "abnormal" (abnormal visible emission are present). An "abnormal" observation will trigger an internal inspection and corrective actions.

- (c) Performance Criteria:
- (i) Data Representativeness: Stack exhaust observations will be performed when the Shot Blast is operating during daylight hours. The stack exhaust condition will be recorded and each value will be compared to the acceptable range. A "normal" observation indicates that the dust collector is operating properly.
- (ii) Verification of Operational Status: Upon completion of an "abnormal" observation, an inspection shall be conducted and if necessary, the dust collector/compartment will be isolated or shut down for repairs.
- (iii) QA/QC Practices and Criteria: The personnel conducting the stack exhaust observations shall be trained in observing normal stack conditions.
- (iv) Monitoring Frequency: Due to the low potential emissions from this source (3.5 tons per year total particulate), weekly observations will be performed. This frequency has proven to be reasonable and adequately demonstrates that the dust collector is operating properly. This approach routinely verifies that abnormal visible emissions are not present and reasonably justifies that particulate matter emissions are not exceeding the limitation of 0.04 grains/DSCF.
- (v) Data Collection Procedures: Observation records are documented on a log sheet and shall be maintained for a minimum of 5-years. Records shall be made available to the Department upon request.
- (vi) Averaging Period: Not applicable.

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

\*\*\* Permit Shield in Effect. \*\*\*

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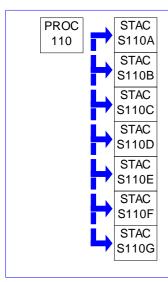
Source ID: 110 Source Name: 110" MILL HEATING FURNACES 1-7

Source Capacity/Throughput:

Conditions for this source occur in the following groups: FURNACES - SOX/PM REQ.

FURNACES= 20 MM<50MM

NOX RACT LIMITS
PRESUMPTIVE RACT II



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

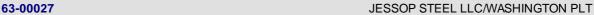
# V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).





#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

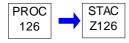




Source ID: 126 Source Name: PICKLING DEPT

Source Capacity/Throughput:

Conditions for this source occur in the following groups: RACT II



#### I. RESTRICTIONS.

# Emission Restriction(s).

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit No. 63-000-027, Condition No.5, NOx emissions from the batch pickling operations shall not exceed 3.0 tons in any 12 consecutive month period.

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall maintain records of NOx emissions from the batch pickling operations and keep for 5 years.

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

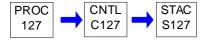


# **SECTION D.** Source Level Requirements

Source ID: 127 Source Name: PRODUCTION BURNING

Source Capacity/Throughput:

Conditions for this source occur in the following groups: MECH. PROCESSES



#### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

# # 001 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.2] Sections of PART 64

# **Applicability**

For Compliance Assurance Monitoring (CAM), the permittee will monitor for the presence of visible emissions from the Powder Burning (Torch Cutter) baghouse exhaust to demonstrate a reasonable assurance that the baghouse controls particulate matter to levels in compliance with the emissions restrictions in this permit.

- 1. Indicator: Visible Emissions Monitoring
- (a) Measurement Approach:

Stack exhaust will be observed on a routine basis to determine if visible emissions are present.

(b) Indicator Range:

Exhaust condition will be determined to be "normal" (abnormal visible emissions are not present) or "abnormal" (abnormal visible emission are present). An "abnormal" observation will trigger an internal inspection and corrective actions.

- (c) Performance Criteria:
- (i) Data Representativeness: Stack exhaust observations will be performed when the Powder Burning (Torch Cutter) is operating during daylight hours. The stack exhaust condition will be recorded and each value will be compared to the acceptable range. A "normal" observation indicates that the baghouse is operating properly.
- (ii) Verification of Operational Status: Upon completion of an "abnormal" observation, an inspection shall be conducted and if necessary, the baghouse/compartment will be isolated or shut down for repairs.
- (iii) QA/QC Practices and Criteria: The personnel conducting the stack exhaust observations shall be trained in observing normal stack conditions.
- (iv) Monitoring Frequency: Due to the low potential emissions from this source (1.1 tons per year total particulate), weekly observations will be performed. This frequency has proven to be reasonable and adequately demonstrates that the baghouse is operating properly. This approach routinely verifies that abnormal visible emissions are not present and reasonably justifies that particulate matter emissions are not exceeding the limitation of 0.04 grains/DSCF.
- (v) Data Collection Procedures: Observation records are documented on a log sheet and shall be maintained for a minimum of 5-years. Records shall be made available to the Department upon request.
- (vi) Averaging Period: Not applicable.

## IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).







#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



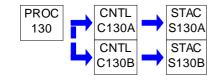


#### SECTION D. **Source Level Requirements**

Source ID: 130 Source Name: GRINDING MACHINES 1 & 2

Source Capacity/Throughput:

Conditions for this source occur in the following groups: MECH. PROCESSES



#### RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# **TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### MONITORING REQUIREMENTS. III.

#### # 001 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.2] **Sections of PART 64**

## **Applicability**

For Compliance Assurance Monitoring (CAM), the permittee will monitor for the presence of visible emissions from the Grinder baghouse exhaust to demonstrate a reasonable assurance that the baghouse controls particulate matter to levels in compliance with the emissions restrictions in this permit.

- 1. Indicator: Visible Emissions Monitoring
- (a) Measurement Approach:

Stack exhaust will be observed on a routine basis to determine if visible emissions are present.

(b) Indicator Range:

Exhaust condition will be determined to be "normal" (abnormal visible emissions are not present) or "abnormal" (abnormal visible emission are present). An "abnormal" observation will trigger an internal inspection and corrective actions.

- (c) Performance Criteria:
- (i) Data Representativeness: Stack exhaust observations will be performed when the Grinder(s) is/are operating during daylight hours. The stack exhaust condition will be recorded and each value will be compared to the acceptable range. A "normal" observation indicates that the baghouse is operating properly.
- (ii) Verification of Operational Status: Upon completion of an "abnormal" observation, an inspection shall be conducted and if necessary, the baghouse/compartment will be isolated or shut down for repairs.
- (iii) QA/QC Practices and Criteria: The personnel conducting the stack exhaust observations shall be trained in observing normal stack conditions.
- (iv) Monitoring Frequency: Due to the low potential emissions from this source (3.6 tons per year total particulate from each grinder), weekly observations will be performed. This frequency has proven to be reasonable and adequately demonstrates that the baghouses are operating properly. This approach routinely verifies that abnormal visible emissions are not present and reasonably justifies that particulate matter emissions are not exceeding the limitation of 0.04 grains/DSCF.
- (v) Data Collection Procedures: Observation records are documented on a log sheet and shall be maintained for a minimum of 5-years. Records shall be made available to the Department upon request.
- (vi) Averaging Period: Not applicable.







#### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).





# **SECTION D.** Source Level Requirements

Source ID: 140 Source Name: BAR MILL ANNEALING FURNACES 3, 4, 5, 7-17

Source Capacity/Throughput:

Conditions for this source occur in the following groups: FURNACES - SOX/PM REQ.

#### I. RESTRICTIONS.

# **Emission Restriction(s).**

# # 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit No. 63-000-027, Condition No.5, total NOx emissions from these combined furnaces shall not exceed 42.2 tons in any 12 consecutive month period.

# # 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit No. 63-000-027, Condition No.6, total VOC emissions from these combined furnaces shall not exceed 1.8 tons in any 12 consecutive month period.

#### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall maintain records of NOx and VOC emissions from these combined furnaces and shall keep for 5 years.

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

#### # 004 [25 Pa. Code §129.93]

# Presumptive RACT emission limitations

In accordance with RACT Operating Permit No. 63-000-027, Condition No.7, the permittee shall install, maintain and operate these furnaces with individual rated gross heat inputs less than twenty (20) million Btu/hour of operation, in accordance with the manufacturers specifications.

## VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

# \*\*\* Permit Shield in Effect. \*\*\*

DEP Auth ID: 1217698 Page 34





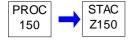
#### SECTION D. **Source Level Requirements**

Source ID: 150 Source Name: S.W.S.L. 400" ANNEALING FURNACE

Source Capacity/Throughput:

Conditions for this source occur in the following groups: FURNACES - SOX/PM REQ.

FURNACES= 20 MM<50MM PRESUMPTIVE RACT II



#### L RESTRICTIONS.

# **Emission Restriction(s).**

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit No. 63-000-027, Condition No.6, VOC emissions from this furnace shall not exceed 0.4 tons in any 12 consecutive month period.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit No. 63-000-027, Condition No.5, NOx emissions from this furnace shall not exceed 15.4 tons in any 12 consecutive month period.

#### **TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall maintain records of NOx and VOC emissions from this furnace and shall keep for 5 years.

#### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### VI. WORK PRACTICE REQUIREMENTS.

# 004 [25 Pa. Code §129.93]

**Presumptive RACT emission limitations** 

In accordance with RACT Operating Permit 63-000-027, Condition No.9, the permittee shall install, maintain and operate this furnace, in accordance with the manufacturers specifications and in a manner consistent with good operating procedures.







# VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).







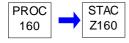
Source ID: 160 Source Name: D.W.S.L. 400" ANNEALING FURNACE

Source Capacity/Throughput:

Conditions for this source occur in the following groups: FURNACES - SOX/PM REQ.

FURNACES= 20 MM<50MM

RACTII



#### L RESTRICTIONS.

## **Emission Restriction(s).**

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit No. 63-000-027, Condition No.5, NOx emissions from this furnace shall not exceed 23.1 tons in any 12 consecutive month period.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit No. 63-000-027, Condition No.6, VOC emissions from this furnace shall not exceed 0.5 tons in any 12 consecutive month period.

### **TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall maintain records of NOx and VOC emissions from this furnace and shall kept for 5 years.

### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### VI. WORK PRACTICE REQUIREMENTS.

# 004 [25 Pa. Code §129.93]

**Presumptive RACT emission limitations** 

In accordance with RACT Operating Permit No. 63-000-027, Condition No.9, the permittee shall install, maintain and operate this furnace, in accordance with the manufacturers specifications and in a manner consistent with good operating procedures.





## VII. ADDITIONAL REQUIREMENTS.

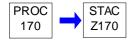
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).





Source ID: 170 Source Name: PARTS CLEANERS

Source Capacity/Throughput:



### RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

#### П. **TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

#### MONITORING REQUIREMENTS. III.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).







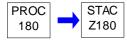
Source ID: 180 Source Name: OLSON 110" MILL REHEAT FURNACE (# 8)

Source Capacity/Throughput:

Conditions for this source occur in the following groups: FURNACES - SOX/PM REQ.

FURNACES= 20 MM<50MM

NOX RACT LIMITS PRESUMPTIVE RACT II



63-00027

### RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### **TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### WORK PRACTICE REQUIREMENTS. VI.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).





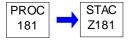
### 63-00027 JESSOP STEEL LLC/WASHINGTON PLT

#### SECTION D. **Source Level Requirements**

Source ID: 181 Source Name: LOI 110" MILL REHEAT FURNACE (# 9)

> Source Capacity/Throughput: 26.100 MMBTU/HR

Conditions for this source occur in the following groups: PRESUMPTIVE RACT II



## RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### **TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### VI. **WORK PRACTICE REQUIREMENTS.**

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### ADDITIONAL REQUIREMENTS. VII.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

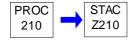




Source ID: 210 Source Name: COOLING TOWERS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: MECH. PROCESSES



### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### VII. ADDITIONAL REQUIREMENTS.

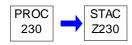
No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).





Source ID: 230 Source Name: VEHICLE TRAVEL (PAVED ROADS)

Source Capacity/Throughput:



### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).



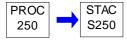




Source ID: 250 Source Name: CHARGE FIRE FURNACE (# 10)

> Source Capacity/Throughput: 22.000 MMBTU/HR

Conditions for this source occur in the following groups: PRESUMPTIVE RACT II



## RESTRICTIONS.

## **Emission Restriction(s).**

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Per PA-63-00027B, condition #2, emissions from the Charge-Fire Furnace shall be limited to 5.5 tons/yr of NOx, 7.9 tons/yr of CO and 1.1 tons/yr of VOCs.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Per PA-63-00027B, condition #4, the maximum gas usage for the Charge-Fire Furnace shall be limited to 189 million cubic feet per 12 consecutive month period.

### TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

#### IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Per PA-63-00027B, condition #6, the owner / operator shall keep monthly records of the fuel used at the Charge-Fire furnace. These records shall be used to determine compliance with fuel usage restrictions and to assist in the calculation of emission estimates. The emission estimates shall be expressed as a 12-month rolling average and maintain on site for a minimum of five years and shall be made available to the Department upon request.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall maintain records of NOx and VOC emissions from this furnace and maintain on site for a minimum of five years and shall be made available to the Department upon request.

### REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).







### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).



63-00027

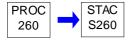


## **SECTION D.** Source Level Requirements

Source ID: 260 Source Name: HYBRID ANNEAL FURNACE

Source Capacity/Throughput: 34.800 MMBTU/HR

Conditions for this source occur in the following groups: PRESUMPTIVE RACT II



## I. RESTRICTIONS.

## **Emission Restriction(s).**

# 001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Per PA-63-00027B, condition #5, the maximum gas usage for the Plate Anneal Furnace shall be limited to 298 million cubic feet per 12 consecutive month period.

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Per PA-63-00027B, condition #3, emissions from the Plate Anneal Furnace shall be limited to 11.7 tons/yr of NOx, 4.9 tons/yr of CO and 1.7 tons/yr of VOCs.

### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

## IV. RECORDKEEPING REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Per PA-63-00027B, condition #6, the owner / operator shall keep monthly records of the fuel used at the Plate Anneal furnace. These records shall be used to determine compliance with fuel usage restrictions and to assist in the calculation of emission estimates. The emission estimates shall be expressed as a 12-month rolling average and maintain on site for a minimum of five years and shall be made available to the Department upon request.

# 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The company shall maintain records of NOx and VOC emissions from this furnace and maintain on site for a minimum of five years and shall be made available to the Department upon request.

### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).





### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

## VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements) and/or Section E (Source Group Restrictions).

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Group Name: FURNACES - SOX/PM REQ.

Group Description: Comb. Sources (Processes), 123.13, 123.21

Sources included in this group

ID	Name
110	110" MILL HEATING FURNACES 1-7
140	BAR MILL ANNEALING FURNACES 3, 4, 5, 7-17
150	S.W.S.L. 400" ANNEALING FURNACE
160	D.W.S.L. 400" ANNEALING FURNACE
180	OLSON 110" MILL REHEAT FURNACE (# 8)

### RESTRICTIONS.

## Emission Restriction(s).

#### # 001 [25 Pa. Code §123.13]

### **Processes**

In accordance with 25 Pa. Code Ch.123.13(c)(1), the permittee shall not permit the emission into the outdoor atmosphere of particulate matter from these processes in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

#### # 002 [25 Pa. Code §123.21]

### **General**

The permittee shall not permit the emission into the outdoor atmosphere of sulfur oxides from the heat treating furnaces in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### MONITORING REQUIREMENTS.

#### # 003 [25 Pa. Code §127.511]

## Monitoring and related recordkeeping and reporting requirements.

At a minimum, the permittee shall verify SO2 emission rates using the most recent periodic monitoring data and/or AP-42 emission factors in conjunction with fuel usage records.

## [25 Pa. Code §127.511]

## Monitoring and related recordkeeping and reporting requirements.

At a minimum, the permittee shall verify particulate matter emission rates using the most recent AP-42 emission factors. along with fuel usage records.

#### # 005 [25 Pa. Code §127.511]

## Monitoring and related recordkeeping and reporting requirements.

The permittee shall perform visual observations of stack opacity from sources in this group with stacks directly exhausting to the atmosphere on a weekly basis to ensure compliance with Ch.123.41 or any other alternative applicable opacity standard.

### IV. RECORDKEEPING REQUIREMENTS.

#### # 006 [25 Pa. Code §127.511]

## Monitoring and related recordkeeping and reporting requirements.

The Owner/Operator shall maintain records containing at a minimum, a Certification of sulfur content in the natural gas utilized in this group of combustion sources.

## [25 Pa. Code §127.511]

## Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain records of natural gas usage on a monthly basis for this group of sources.







## # 008 [25 Pa. Code §127.511]

## Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain records of incidents where the stack opacity of any of the above sources equals or exceeds 20 percent and any action taken as a result of these opacity observations.

### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).







Group Name: FURNACES= 20 MM<50MM

Group Description: Furnaces - RACT/Periodic Monitoring

Sources included in this group

ID	Name
110	110" MILL HEATING FURNACES 1-7
150	S.W.S.L. 400" ANNEALING FURNACE
160	D.W.S.L. 400" ANNEALING FURNACE
180	OLSON 110" MILL REHEAT FURNACE (# 8)

### I. RESTRICTIONS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### III. MONITORING REQUIREMENTS.

### [25 Pa. Code §127.511]

## Monitoring and related recordkeeping and reporting requirements.

The permittee shall utilize a portable analyzer to measure NOx and CO emissions for these combustion sources. At a minimum, periodic monitoring shall occur once in each 12 month consecutive period for each furnace in this group.

#### # 002 [25 Pa. Code §127.511]

### Monitoring and related recordkeeping and reporting requirements.

At a minimum, the permittee shall verify VOC emission rates from these sources, using comparable stack test data, the most current AP-42 emission factors or other applicable methods with prior written approval from the Department.

## IV. RECORDKEEPING REQUIREMENTS.

#### # 003 [25 Pa. Code §129.93]

### **Presumptive RACT emission limitations**

In accordance with RACT Operating Permit No. 63-000-027, Condition No.10, the Permittee shall maintain records for each adjustment conducted during the performance of the annual adjustment or tune-up on each boiler. These records shall contain, at a minimum, the following information;

- (i) The date of the tuning procedure
- (ii) The name of the service company and the technicians
- (iii) The final operating rate or load
- (iv) The final CO and NOx emission rates
- (v) The final excess oxygen rate

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### VI. WORK PRACTICE REQUIREMENTS.

#### # 004 [25 Pa. Code §129.93]

### **Presumptive RACT emission limitations**

The permittee shall make the annual adjustment in accordance with the EPA document "Combustion Efficiency Optimization Manual for Operators of Oil and Gas-Fired Boilers," September 1983 (EPA-340/1-83-023) or equivalent procedures approved in writing by the Department.

#### # 005 [25 Pa. Code §129.93]

### **Presumptive RACT emission limitations**

The permittee shall perform an annual adjustment or tune-up as required by RACT Operating Permit No. 63-000-027, for





these furnaces. This adjustment shall include, at a minimum, the following:

- (i) Inspection, adjustment, cleaning or replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
- (ii) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NOx, and to the extent practicable minimize emissions of CO.
- (iii) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and opertion as specified by the manufacturer.

### VII. ADDITIONAL REQUIREMENTS.

63-00027

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

\*\*\* Permit Shield in Effect. \*\*\*



Group Name: MECH. PROCESSES

Group Description: Non-combustion particulate sources, 123.13

Sources included in this group

ID	Name
102	SHOT-BLAST
127	PRODUCTION BURNING
130	GRINDING MACHINES 1 & 2
210	COOLING TOWERS

### I. RESTRICTIONS.

## **Emission Restriction(s).**

## # 001 [25 Pa. Code §123.13]

### **Processes**

In accordance with 25 Pa. Code Ch.123.13(c)(1), the permittee shall not permit the emission into the outdoor atmosphere of particulate matter from these processes in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### III. MONITORING REQUIREMENTS.

## # 002 [25 Pa. Code §127.511]

## Monitoring and related recordkeeping and reporting requirements.

At a minimum, the permittee shall verify particulate matter emission rates using the most recent AP-42 emission factors or other methods with prior approval from the Department.

## IV. RECORDKEEPING REQUIREMENTS.

## # 003 [25 Pa. Code §127.511]

## Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain records of incidents where the stack opacity of any of the above sources equals or exceeds 20 percent and any action taken as a result of these opacity observations.

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).



# 63-00027



## SECTION E. Source Group Restrictions.

Group Name: NOX RACT LIMITS

Group Description: 8 - 110" Mill Heat Treating Furnaces

Sources included in this group

ID	Name
110	110" MILL HEATING FURNACES 1-7
180	OLSON 110" MILL REHEAT FURNACE (# 8)

### I. RESTRICTIONS.

## **Emission Restriction(s).**

## # 001 [25 Pa. Code §127.441]

## Operating permit terms and conditions.

In accordance with RACT Operating Permit No. 63-000-027, Condition No.6, total VOC emissions from these combined furnaces shall not exceed 1.7 tons in any 12 consecutive month period.

## # 002 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

In accordance with RACT Operating Permit No. 63-000-027, Condition No.5, total NOx emissions from these combined furnaces shall not exceed 95.3 tons in any 12 consecutive month period.

### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## IV. RECORDKEEPING REQUIREMENTS.

### # 003 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The company shall maintain records of NOx and VOC emissions from these combined furnaces and maintain on site for a minimum of five years and shall be made available to the Department upon request.

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## \*\*\* Permit Shield in Effect. \*\*\*

#### 63-00027 JESSOP STEEL LLC/WASHINGTON PLT



#### SECTION E. **Source Group Restrictions.**

Group Name: PRESUMPTIVE RACT II

Group Description: Sources rated equal to or greater than 20 MMBtu/hr and less than 50 MMBtu/hr.

Sources included in this group

ID	Name
110	110" MILL HEATING FURNACES 1-7
150	S.W.S.L. 400" ANNEALING FURNACE
180	OLSON 110" MILL REHEAT FURNACE (# 8)
181	LOI 110" MILL REHEAT FURNACE (# 9)
250	CHARGE FIRE FURNACE (# 10)
260	HYBRID ANNEAL FURNACE

## I. RESTRICTIONS.

## **Emission Restriction(s).**

#### # 001 [25 Pa. Code §129.100]

Compliance demonstration and recordkeeping requirements.

- (d) The owner and operator of an air contamination source subject to this section and § \$ 129.96—129.99 shall keep records to demonstrate compliance with § § 129.96—129.99 in the following manner:
- (1) The records must include sufficient data and calculations to demonstrate that the requirements of § § 129.96-129.99 are met.
- (2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
- (e) Beginning with the compliance date specified in § 129.97(a), the owner or operator of an air contamination source claiming that the air contamination source is exempt from the applicable NOx emission rate threshold specified in § 129.99(b) and the requirements of § 129.97 based on the air contamination source's potential to emit shall maintain records that demonstrate to the Department or appropriate approved local air pollution control agency that the air contamination source is not subject to the specified emission rate threshold.
- (f) Beginning with the compliance date specified in § 129.97(a), the owner or operator of an air contamination source claiming that the air contamination source is exempt from the applicable VOC emission rate threshold specified in § 129.99(c) and the requirements of § 129.97 based on the air contamination source's potential to emit shall maintain records that demonstrate to the Department or appropriate approved local air pollution control agency that the air contamination source is not subject to the specified emission rate threshold.
- (g) The owner or operator of a combustion unit subject to § 129.97(b) shall record each adjustment conducted under the procedures in § 129.97(b). This record must contain, at a minimum:
- (1) The date of the tuning procedure.
- (2) The name of the service company and the technician performing the procedure.
- (3) The final operating rate or load.
- (4) The final NOx and CO emission rates.
- (5) The final excess oxygen rate.
- (6) Other information required by the applicable operating permit.



## # 002 [25 Pa. Code §129.97]

## Presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule.

- (b) The owner and operator of a source specified in this subsection, which is located at a major NOx emitting facility or major VOC emitting facility subject to § 129.96 shall comply with the following:
- (1) The presumptive RACT requirement for a combustion unit with a rated heat input equal to or greater than 20 million Btu/hour and less than 50 million Btu/hour, which is the performance of a biennial tune-up conducted in accordance with the procedures in 40 CFR 63.11223 (relating to how do I demonstrate continuous compliance with the work practice and management practice standards). The biennial tune-up must include, at a minimum, the following:
- (i) Inspection and cleaning or replacement of fuel-burning equipment, including the burners and components, as necessary, for proper operation as specified by the manufacturer.
- (ii) Inspection of the flame pattern and adjustment of the burner, as necessary, to optimize the flame pattern to minimize total emissions of NOx and, to the extent possible, emissions of CO.
- (iii) Inspection and adjustment, as necessary, of the air-to-fuel ratio control system to ensure proper calibration and operation as specified by the manufacturer.
- (2) The owner or operator of a combustion unit with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up shall conduct a tune-up of the boiler one time in each 5-year calendar period. The tune-up must include, at a minimum, the following:
- (i) Inspection and cleaning or replacement of fuel-burning equipment, including the burners and components, as necessary, for proper operation as specified by the manufacturer.
- (ii) Inspection of the flame pattern and adjustment of the burner, as necessary, to optimize the flame pattern to minimize total emissions of NOx and, to the extent possible, emissions of CO.
- (iii) Inspection and adjustment, as necessary, of the air-to-fuel ratio control system to ensure proper calibration and operation as specified by the manufacturer.

## II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### IV. RECORDKEEPING REQUIREMENTS.

## # 003 [25 Pa. Code §129.100]

Compliance demonstration and recordkeeping requirements.

The applicable recordkeeping requirements of § 129.100(d), (e) or (f) (relating to compliance demonstration and recordkeeping requirements).

### V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).







## VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).



# 63-00027



## SECTION E. Source Group Restrictions.

Group Name: RACT II

Group Description: RACT II sources

Sources included in this group

ID	Name
126	PICKLING DEPT
160	D.W.S.L. 400" ANNEALING FURNACE

### I. RESTRICTIONS.

## **Emission Restriction(s).**

## # 001 [25 Pa. Code §129.99]

## Alternative RACT proposal and petition for alternative compliance schedule.

All air cleaning devices and air contamination sources at the facility shall be operated and maintained in accordance with manufacturer's specification and good air pollution and engineering practices.

### II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### IV. RECORDKEEPING REQUIREMENTS.

## # 002 [25 Pa. Code §129.100]

## Compliance demonstration and recordkeeping requirements.

- (d) The owner and operator of an air contamination source subject to this section and § § 129.96—129.99 shall keep records to demonstrate compliance with § § 129.96—129.99 in the following manner:
- (1) The records must include sufficient data and calculations to demonstrate that the requirements of § § 129.96—129.99 are met.
- (2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.

## V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

### VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

## \*\*\* Permit Shield in Effect. \*\*\*





# **SECTION F.** Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.





# **SECTION G.** Emission Restriction Summary.

No emission restrictions listed in this section of the permit.





## **SECTION H. Miscellaneous.**

The following sources qualify as insignificant activities and have no applicable requirements:

Wastewater Treatment Plant
Wastwater Treatment Plant Silo
Baghouse Dust Silo
Parts cleaner
Sulfuric Acid Storage Tank
Process Tank
Non-VOC/HAP Storage Tanks
Plasma Cutters
Ingersoll Milling machine
Shears
Levelers & Flatteners
Cut-off Saws
CleaNOx Pickling
Two (2) Gantry Belt Grinders
Two (2) High Efficienciency Cyclone





\*\*\*\*\* End of Report \*\*\*\*\*