



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM**

TITLE V/STATE OPERATING PERMIT

Issue Date:	May 3, 2023	Effective Date:	October 4, 2023
Revision Date:	October 4, 2023	Expiration Date:	May 2, 2028
Revision Type:	Modification, Significant		

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: 46-00011

Federal Tax Id - Plant Code: 20-0653500-2

Owner Information

Name: CLEVELAND CLIFFS PLATE LLC
Mailing Address: 900 CONSHOHOCKEN RD
CONSHOHOCKEN, PA 19428-1038

Plant Information

Plant: CLEVELAND CLIFFS PLATE/CONSHOHOCKEN PLT
Location: 46 Montgomery County 46944 Plymouth Township
SIC Code: 3312 Manufacturing - Blast Furnaces And Steel Mills

Responsible Official

Name: JACE J BRENNER
Title: OPERATIONS MGR
Phone: (610) 383 - 2397 Email: jace.brenner@clevelandcliffs.com

Permit Contact Person

Name: RAY AJALLI
Title: DIV MGR ENV
Phone: (610) 383 - 2097 Email: ray.ajalli@clevelandcliffs.com

[Signature] _____
JAMES D. REBARCHAK, SOUTHEAST REGION AIR PROGRAM MANAGER



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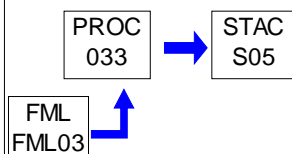
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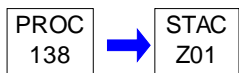
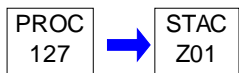
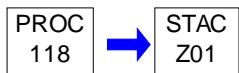
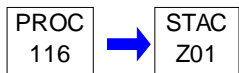
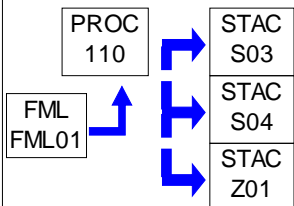
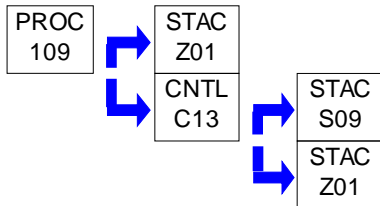
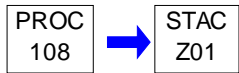
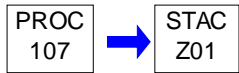
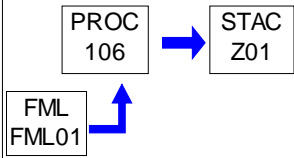
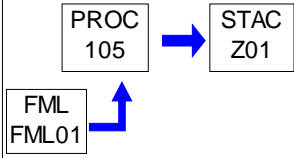
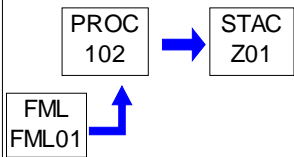
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
033	3-EMERGENCY DIESEL GENERATORS		
102	QUENCH FURNACE	20.000 Tons/HR	STEEL PLATE
		88.600 MCF/HR	Natural Gas
105	MISC CUTTING/HEATING	150.000 MCF/HR	Natural Gas
106	ROSE ANNEALING FURNACE	20.000 Tons/HR	STEEL PLATE
		64.500 MCF/HR	Natural Gas
107	STEEL PLATE ROLL PAINTING	3.500 Gal/HR	COATINGS
108	PARTS WASHERS	30.000 Gal/HR	SOLVENTS
		200.000 Lbs/HR	SOLVENTS
109	SHOT BLASTING MACHINE & CARTRIDGE COLLECTOR SYSTEM	12.500 Tons/HR	STEEL PLATE
110	SLAB HEATING FURNACES 1 & 2	200.000 Tons/HR	STEEL SLABS
		208.000 MCF/HR	Natural Gas
116	1000 GAL GASOLINE STORAGE TANK	1,000.000 Gal/HR	GASOLINE
118	MAINTENANCE ACTIVITIES/ MISC VOC'S	15.000 Lbs/HR	SOLVENTS
127	4-HI ROLLING MILL	172.000 Tons/HR	STEELPLATES
138	IDENTIFICATION MARKING	3.000 Gal/HR	COATING
151	STECKEL ROLLING MILL	172.000 Tons/HR	COILED STEEL
152	TEMPER FURNACE	20.000 Tons/HR	STEEL PLATE
		94.000 MCF/HR	Natural Gas
153	CUT-TO-LENGTH LINE & BAGHOUSE	100.000 Tons/HR	STEEL PLATE
154	STECKEL MILL FURNACES "A" & "B"	170.000 Tons/HR	STEEL SLABS
		24.000 MCF/HR	Natural Gas
C12	CUT-TO-LENGTH LINE BAGHOUSE		
C13	CAMFIL FARR DUST COLLECTOR		
FML01	NATURAL GAS LINE		
FML03	DIESEL FUEL		
S03	SLAB HEATING FURNACE STACK		
S04	SLAB HEATING FURNACE STACK		
S05	EMERGENCY GENERATOR STACK		
S09	BAGHOUSE EXHAUST		
S10	CUT-TO-LENGTH LINE STACK		
Z01	FUGITIVE EMISSIONS		

PERMIT MAPS

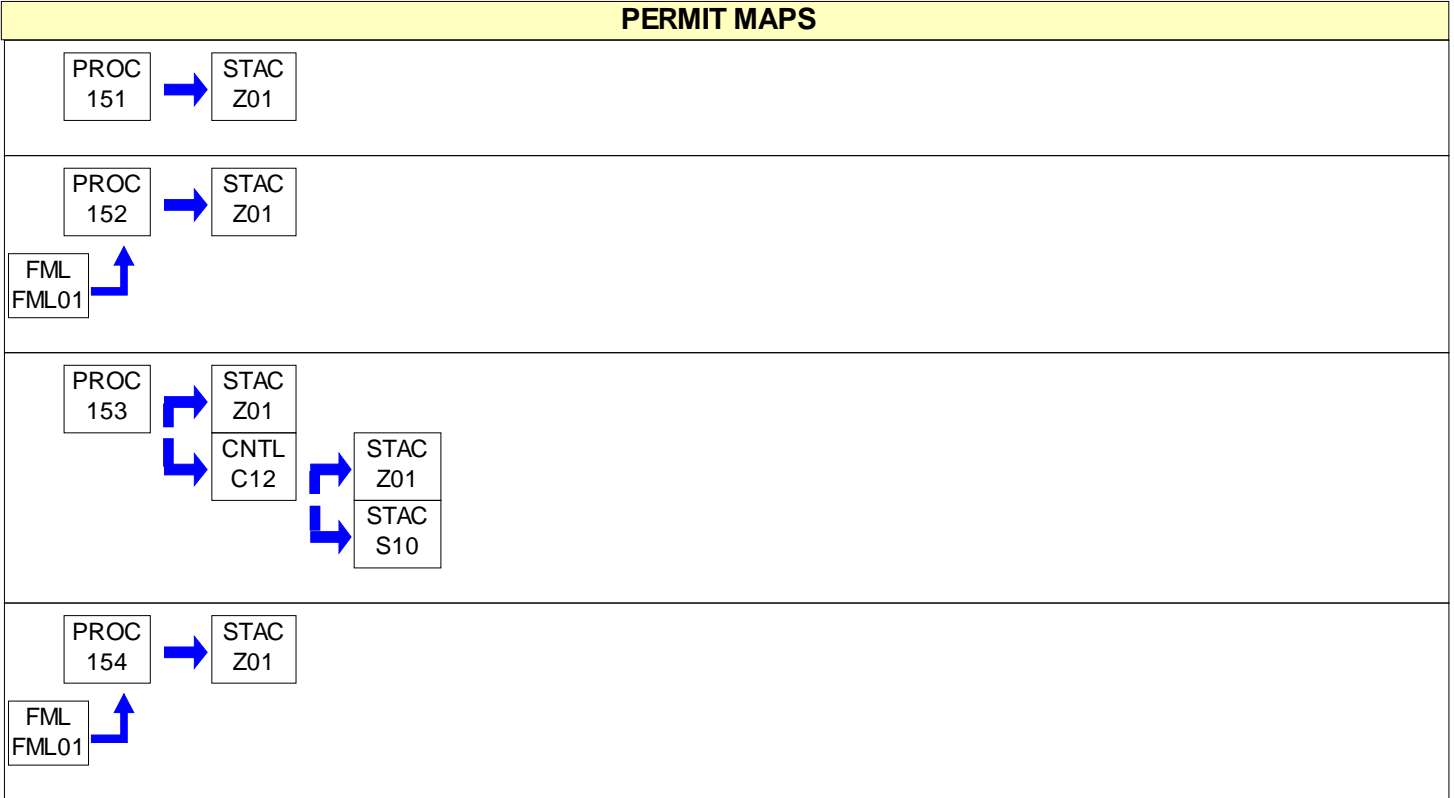


PERMIT MAPS





PERMIT MAPS



**SECTION B. General Title V Requirements****#001 [25 Pa. Code § 121.1]****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 & 127.704(b)]**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. The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and submitted with the fee form to the respective regional office.

(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

**SECTION B. General Title V Requirements**

the Department.

(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**

(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.

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

**SECTION B. General Title V Requirements****#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 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). The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.

(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.

**SECTION B. General Title V Requirements**

(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 maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.

(1) Eight thousand dollars (\$8,000) for calendar years 2021—2025.

(2) Ten thousand dollars (\$10,000) for calendar years 2026—2030.

(3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

#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 NO_x from a single source during the term of the permit and 5 tons of NO_x 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.

**SECTION B. General Title V Requirements**

(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

**SECTION B. General Title V Requirements**

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:

Enforcement & Compliance Assurance Division
Air, RCRA and Toxics Branch (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2852

The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

(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.

**SECTION B. General Title V Requirements**

(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.

(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**

(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 in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.

**SECTION B. General Title V Requirements****#027 [25 Pa. Code § 127.3]****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)
- (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.

**SECTION B. General Title V Requirements**

(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.

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this 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)]**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.

**SECTION C. Site Level Requirements****I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §121.7]****Prohibition of air pollution.**

The permittee shall not permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. Section 4003).

002 [25 Pa. Code §123.1]**Prohibition of certain fugitive emissions**

(a) The permittee shall not 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) Open burning operations, as specified in 25 Pa. Code 129.14.

(7) Blasting in open pit mines. Emissions from drilling are not considered as emissions from blasting.

(8) Coke oven batteries, provided the fugitive air contaminants emitted from any coke oven battery comply with the standards for visible fugitive emissions in §§ 123.44 and 129.15 (relating to limitations of visible fugitive air contaminants from operation of any coke oven battery; and coke pushing operations).

(9) Sources and classes of sources other than those identified in paragraphs (1)-(8), 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 shall not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa. Code § 123.1(a)(1-9) if such 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 such 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:

(a) Equal to or greater than 20% for a period or periods aggregating more than three (3) minutes in any one (1) hour.

(b) Equal to or greater than 60% at any time.

**SECTION C. Site Level Requirements****# 006 [25 Pa. Code §123.42]****Exceptions**

The limitations of 25 Pa. Code § 123.41, shall not apply to a visible emission in any of the following instances:

- (a) When the presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) When the emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.

007 [25 Pa. Code §129.14]**Open burning operations**

The permittee shall not permit the open burning of material in the Southeast Air Basin, except when the open burning results from:

- (a) 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.
- (b) Any fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (c) A fire set solely for cooking food.
- (d) A fire set solely for recreational or ceremonial purposes.
- (e) A fire set for the prevention and control of disease or pests, when approved by the Department.

II. TESTING REQUIREMENTS.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512.]

- (a) If at any time the Department has cause to believe that air contaminant emissions from any source(s) listed in Section A, of this Permit, may be in excess of the limitations specified in this Permit, or established pursuant to, any applicable rule or regulation contained in 25 Pa. Code Article III, the permittee shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s).
- (b) Such testing shall be conducted in accordance with the provisions of 25 Pa. Code Chapter 139, when applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the permittee that testing is required.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The Department reserves the right to require exhaust stack testing of sources as necessary during the permit term to verify emissions for purposes including permit condition violations, emission fees, or malfunctioning.

III. MONITORING REQUIREMENTS.**# 010 [25 Pa. Code §123.43]****Measuring techniques**

Visible emissions, pursuant to 25 Pa. Code 123.41, shall may be measured using either of the following:

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

**SECTION C. Site Level Requirements****# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511]

- (a) The permittee shall monitor the facility, once per operating day, for the following:
- (1) odors which may be objectionable (as per 25 Pa. Code §123.31);
 - (2) visible emissions (as per 25 Pa. Code §§123.41 and 123.42); and
 - (3) fugitive particulate matter (as per 25 Pa. Code §§ 123.1 and 123.2).
- (b) Objectionable odors, fugitive particulate emissions, and visible emissions that are caused or may be caused by operations at the site shall:
- (1) be investigated;
 - (2) be reported to the facility management, or individual(s) designated by the permittee;
 - (3) have appropriate corrective action taken (for emissions that originate on-site); and
 - (4) be recorded in a permanent written log.
- (c) After six (6) months of daily monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the monitoring frequency to weekly.
- (d) After six (6) months of weekly monitoring, and upon the permittee's request, the Department will determine the feasibility of decreasing the frequency of monitoring to monthly.
- (e) The Department reserves the right to change the above monitoring requirements at any time, based on but not limited to: the review of the compliance certification (if applicable), complaints, monitoring results, and/or Department findings.

IV. RECORDKEEPING REQUIREMENTS.**# 012 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep records of all monitoring of fugitive emissions, visible emissions and odors, including those that deviate from the conditions found in this permit. The record of deviations shall contain, at a minimum, the following items:

- (a) Date, time, and location of the incident(s).
- (b) The cause of the event.
- (c) The corrective action taken, if necessary, to abate the situation and prevent future occurrences.

013 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall keep records of all the facility's increases of emissions from the following categories:

- (a) de minimis increases without notification to the Department;
- (b) de minimis increases with notification to the Department, via letter;
- (c) increases resulting from a Request for Determination (RFD) to the Department; and
- (d) increases resulting from the issuance of a plan approval and subsequent operating permit.

014 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall keep records of the individual and combined HAP emissions from the facility monthly and on a 12-month rolling sum.

V. REPORTING REQUIREMENTS.**# 015 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.511.]

- (a) The permittee shall report malfunctions, emergencies or incidents of excess emissions to the Department at 484-250-

**SECTION C. Site Level Requirements**

5920. A malfunction is any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. An emergency is any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator of a facility which requires immediate corrective action to restore normal operation and which causes the emission source to exceed emissions, due to unavoidable increases in emissions attributable to the situation. An emergency shall not include situations caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

(b) When the malfunction, emergency or incident of excess emissions poses an imminent danger to the public health, safety, welfare, or environment, it shall be reported to the Department and the County Emergency Management Agency by telephone within one (1) hour after the discovery of the malfunction, emergency or incident of excess emissions. The owner or operator shall submit a written or emailed report of instances of such malfunctions, emergencies or incidents of excess emissions to the Department within three (3) business days of the telephone report.

(c) The report shall describe the following:

- (1) Name, permit or authorization number, and location of the facility;
- (2) Nature and cause of the malfunction, emergency or incident;
- (3) Date and time when the malfunction, emergency or incident was first observed;
- (4) Expected duration of excess emissions;
- (5) Estimated rate of emissions; and
- (6) Corrective actions or preventative measures taken.

(d) Any malfunction, emergency or incident of excess emissions that is not subject to the notice requirements of paragraph (b) of this condition shall be reported to the Department by telephone within 24 hours (or by 4:00 PM of the next business day, whichever is later) of discovery and in writing or by e-mail within five (5) business days of discovery. The report shall contain the same information required by paragraph (c), and any permit specific malfunction reporting requirements.

(e) During an emergency an owner or operator may continue to operate the source at their discretion provided they submit justification for continued operation of a source during the emergency and follow all the notification and reporting requirements in accordance with paragraphs (b)-(d), as applicable, including any permit specific malfunction reporting requirements.

(f) Reports regarding malfunctions, emergencies or incidents of excess emissions shall be submitted to the appropriate DEP Regional Office Air Program Manager.

(g) Any emissions resulted from malfunction or emergency are to be reported in the annual emissions inventory report, if the annual emissions inventory report is required by permit or authorization.

016 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The Department has changed the deviation and compliance certification reporting requirements. The initial reports for (a) and (b), below, shall be due on the dates provided and may cover only a partial reporting period. The permittee shall submit the following reports:

(a) An annual certificate of compliance, due by April 1st of each year, for the period covering January 1 through December 31 of the previous year. This certificate of compliance shall document compliance with all permit terms and conditions set forth in this Title V permit as required under condition #24 of section B of this permit. The annual certificate of compliance shall be submitted to the Department in paper or electronic form and to the EPA Region III in electronic form at the following email address:

R3_APD_Permits@EPA.gov

(b) A semi annual deviation report, due by October 1, of each year, for the period covering January 1 through June 30 of the same year. Note: The annual certification of compliance fulfills the obligation for the second deviation reporting period (July 1 through December 31 of the previous year).

**SECTION C. Site Level Requirements****# 017 [25 Pa. Code §135.21]****Emission statements**

The permittee shall submit, by March 1 of each year, an annual emission statement for the preceding calendar year. The statement shall contain the calculation methods and the time periods over which the calculations were made.

018 [25 Pa. Code §135.3]**Reporting**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.441.]

The permittee, who has been previously advised by the Department to submit a source report, shall submit by March 1, of each year, a source report for the preceding calendar year. The report shall include information from 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, including those sources listed in the Miscellaneous Section of this permit.

The permittee 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.**# 019 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

A person responsible for any source specified in 25 Pa. Code § 123.1(a)(1-9), shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (a) Use, where possible, of water or suitable chemicals, as approved by the Department, for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (b) Application of asphalt, water, or suitable chemicals, as approved by the Department, on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
- (c) Paving and maintenance of roadways.
- (d) 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.

020 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall immediately, upon discovery, implement measures, which may include the application for the installation of an air cleaning device(s), if necessary, to reduce the air contaminant emissions to within applicable limitations, if at any time the operation of the source(s) identified in Section A of this permit, is causing the emission of air contaminants in excess of the limitations specified in, or established pursuant to, 25 Pa. Code Article III, or any other applicable rule promulgated under the Clean Air Act.

021 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- (a) The permittee shall not modify any source identified in Section A of this permit, prior to obtaining Department approval except those modifications authorized by Condition #017(g) of Section B, of this permit.
- (b) If an unauthorized modification of a source(s) occurs at the facility, this permit may be suspended and the permittee shall not thereafter continue to operate the affected source(s) until such time as proper Department approval documentation is obtained.

022 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]

The permittee shall ensure that the sources and air cleaning devices and sources, listed in Section A and Section G, where applicable, of this operating permit, are operated and maintained in a manner consistent with good operating and

**SECTION C. Site Level Requirements**

maintenance practices and good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

023 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.2]

Subpart A--General Provisions**Definitions.**

This facility is classified as an area source of hazardous air pollutants (HAPs) as defined in 40 CFR Part 63.2, National Emissions Standards for Hazardous Air Pollutants. The emissions of HAPs from the facility will be limited to 10 tons per year (tpy) for a single HAP and 25 tons per year for all HAP combined, on a 12-month rolling sum basis.

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.

***** Permit Shield In Effect *****

**SECTION D. Source Level Requirements**

Source ID: 033

Source Name: 3-EMERGENCY DIESEL GENERATORS

Source Capacity/Throughput:

Conditions for this source occur in the following groups: RACT I VOC

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from any of the units that make up this source in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grains per dry standard cubic foot.

Fuel Restriction(s).**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that the emergency generators shall be fired on diesel fuel only.

Operation Hours Restriction(s).**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from §40 CFR 63.6640(f), Subpart ZZZZ.]

(a). The permittee shall operate the emergency stationary R.I.C.E. according to the requirements in the most recent version of 40 C.F.R. Section 63.6640(f).

(b). If the permittee does not operate the engine according to the requirements of 40 C.F.R. Section 63.6640(f), the engine will not be considered an emergency engine under 40 C.F.R. Part 63 Subpart ZZZZ and must meet all requirements for non-emergency engines.

004 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from §40 CFR 63.6640 and Table 2d. of §40 CFR 63, Subpart ZZZZ.]

(a) The permittee shall ensure that the operation of any of the three (3) emergency generators shall not exceed 300 hours during any twelve (12) month rolling period.

(b) During periods of startup, the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emissions limitations apply.

[Note: Sources can petition the EPA Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.]

**SECTION D. Source Level Requirements**

Compliance with condition (a) above, assures compliance with 25 Pa. Code Section 129.112(c)(10).

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.**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from §40 CFR 63.6625(f).]

The permittee shall monitor the following:

- (a) The hours of operation, using a non-resettable hour meter for the emergency generators, on a monthly and 12-month rolling basis.
- (b) The fuel usage for the emergency generators, on a monthly basis and 12-month rolling basis.
- (c) The sulfur content of the as-delivered fuel.

IV. RECORDKEEPING REQUIREMENTS.**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from §40 CFR 63.6655(f).]

The permittee shall keep records of the following:

- (a) The hours of operation, using a non-resettable hour meter for the emergency generators, on a monthly and 12-month rolling basis.
- (b) The fuel usage, on a monthly and 12-month rolling basis.
- (c) The delivery receipt from the fuel supplier showing the percent sulfur in the fuel for each fuel oil delivery.
- (d) The hours spent for emergency operation (and what classified the operation as an operation).
- (e) The hours spent for non-emergency operation.
- (f) The inspections required by Subpart ZZZZ to include when the oil and oil filter was changed, when the air cleaner was inspected and when the belts and hoses were inspected, and any other emission related repairs and maintenance. The inspection records must include dates and the corresponding hour meter readings.

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).

**SECTION D. Source Level Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority or permit condition is also derived from 25 Pa. Code §§ 127.512(h) and 129.97(c).]

The permittee shall ensure that all three (3) emergency generators shall be maintained and operated in accordance with manufacturers' specifications or in accordance with good air pollution control practices.

[Compliance with this condition assures compliance with 25 Pa. Code § 129.112(c)(10)]

VII. ADDITIONAL REQUIREMENTS.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source consists of three (3) diesel fuel-fired emergency generators rated at 300 kW, 200 kW, and 125 kW, respectively.

009 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6580]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What is the purpose of subpart ZZZZ?**

(a) Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

(b) The 3-Emergency Diesel Generators are subject to 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart ZZZZ.

010 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.6603]**Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines****What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?**

Pursuant Table 2d to Subpart ZZZZ of 40 CFR 63 (Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions), the owner and operator of an existing emergency, stationary CI RICE located at area sources of HAP emissions must:

(a) Change oil and filter every 500 hours of operation or annually, whichever comes first;

(b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;

(c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[Note: Facilities have the option to utilize an oil analysis program as described in 40 CFR § 63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.]

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

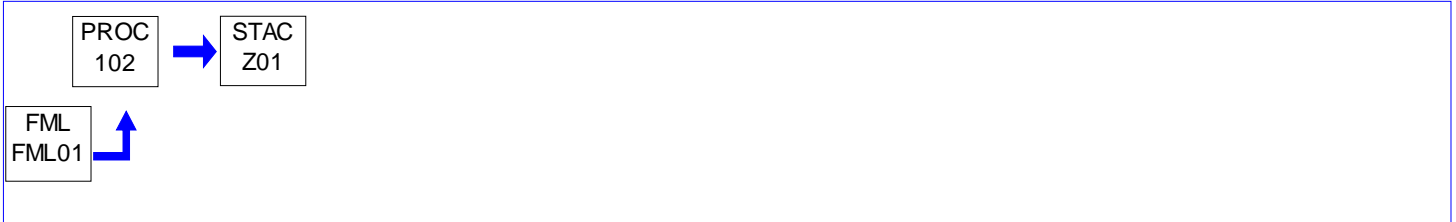
**SECTION D. Source Level Requirements**

Source ID: 102

Source Name: QUENCH FURNACE

Source Capacity/Throughput:	20.000 Tons/HR	STEEL PLATE
	88.600 MCF/HR	Natural Gas

Conditions for this source occur in the following groups: GRP 1
 RACT I VOC
 RACT II

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of filterable particulate matter, as measured by Method 5 of 40 CFR 60, Appendix A (or an equivalent method approved by the Department), from this source at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

002 [25 Pa. Code §123.21]**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source 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.

003 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall ensure that the total nitrogen oxide (NO_x) emissions from the following sources shall not exceed 176.68 tons per year, calculated on a 12-month rolling sum:

- (a) Steckel Mill Furnaces "A" & "B" (Source ID: 154)
- (b) Slab Heating Furnaces 1 & 2 (Source ID: 110)
- (c) Rose Annealing Furnace (Source ID: 106)
- (d) Quench Furnace (Source ID: 102)
- (e) Temper Furnace (Source ID: 152)

004 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall limit the NO_x emissions from this source ID to less than 50.55 tons per year calculated on a 12-month rolling sum.

[Compliance with this condition assures compliance with RACT I condition number 8]

Fuel Restriction(s).**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that only natural gas is used as fuel for the Quench Furnace (Source ID: 102).

**SECTION D. Source Level Requirements****Throughput Restriction(s).****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the fuel used by the Quench Furnace (Source ID: 102) to 722,143 MCF of natural gas, annually, calculated on a 12-month rolling sum.

[Compliance with this condition assures compliance with RACT I condition number 9]

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.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall monitor the amount of fuel used by the Quench Furnace (Source ID: 102) on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep records of the amount of fuel used by the Quench Furnace (Source ID: 102) on a monthly basis.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain on site copies of the temperature monitoring records. Such records may be maintained in electronic format.

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.**# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall calculate the nitrogen oxide (NO_x) emissions by multiplying the annual usage of natural gas by the emission factor of 0.140 lb NO_x/MCF of fuel used.

011 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional Authority for this permit condition was derived from 25 Pa. Code § 127.512 and 25 Pa. Code § 129.99]

The permittee shall ensure that the Quench Furnace (Source ID: 102) shall be maintained and operated in accordance with manufacturer's specifications and in accordance with good air pollution control practices.

In the event that manufacturer specifications are not available, the permittee shall, on a biennially basis, conduct furnace checks and adjustments to include fuel to air ratio checks and subsequent adjustments are utilized to ensure proper and efficient operational performance and minimize emissions from the source.

**SECTION D. Source Level Requirements**

(Compliance with this condition assures compliance with 25 Pa. Code Section 129.112(c)(2) and 25 Pa. Code Section 129.114(a)).

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).

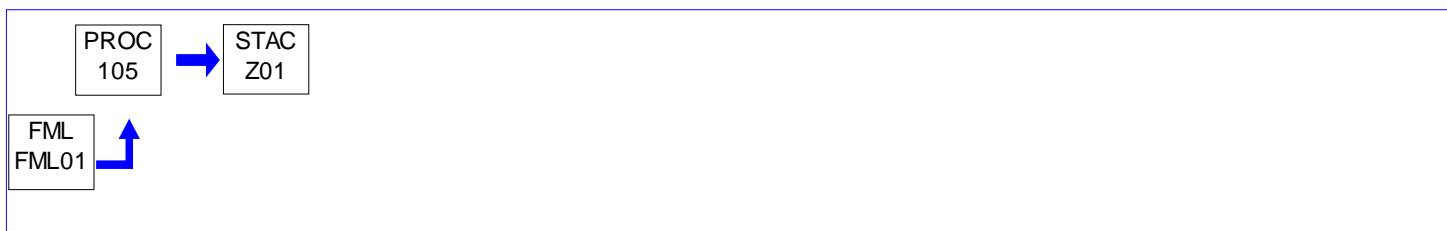
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 105

Source Name: MISC CUTTING/HEATING

Source Capacity/Throughput: 150.000 MCF/HR Natural Gas

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This Source ID 105 (Misc Cutting/Heating) is comprised of the following individual operations:

- Misc Cutting torches
- Fugitive NG lines
- Space heaters
- Four Slab pre-heaters (No. 1 thru 4)
- Emergency WWTP Diesel Pump
- General maintenace torches

Each individual operation listed above is limited to the following VOC emission limit: less than 3 lbs/hr (averaged daily), 15 lbs/day (averaged daily) and 2.7 tons per year calculated on a 12-month rolling sum.

[Compliance with this condition assures compliance with RACT I condition No.10]

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 §127.441]****Operating permit terms and conditions.**

The permittee shall calculate the VOC emissions in lb/hr, lb/day and tpy for the following:

- Misc Cutting torches
- Fugitive NG lines
- Space heaters
- Four Slab pre-heaters (No. 1 thru 4)
- Emergency WWTP Diesel Pump
- General maintenace torches

003 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall monitor the fuel used by the Miscellaneous Cutting/Heating sources (Source ID: 105) by deducting all separately metered fuel uses from the total monthly fuel usage data.

**SECTION D. Source Level Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep records of the VOC emissions for the following operations to demonstrate compliance with the VOC emission limits of less than 3 lbs/hr (averaged daily), 15 lbs/day (averaged daily) and 2.7 tons per year calculated on a 12-month rolling sum.

- Misc Cutting torches
- Fugitive NG lines
- Space heaters
- Four Slab pre-heaters (No. 1 thru 4)
- Emergency WWTP Diesel Pump
- General maintenance torches

005 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall keep records of the amount of fuel used by the Miscellaneous Cutting/Heating sources (Source ID: 105) on a monthly basis by deducting all separately metered fuel uses from the monthly fuel usage data.

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.**# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall operate this source according to the manufacturer specifications or good operating practices.

(Compliance with this condition assures compliance with 25 Pa. Code Section 129.112(c)(1)).

VII. ADDITIONAL REQUIREMENTS.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This Source ID 105 (Misc Cutting/Heating) is comprised of the following individual operations:

- Misc Cutting torches
- Fugitive NG lines
- Space heaters
- Four Slab pre-heaters (No. 1 thru 4)
- Emergency WWTP Diesel Pump
- General maintenance torches

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

**SECTION D. Source Level Requirements**

Source ID: 106

Source Name: ROSE ANNEALING FURNACE

Source Capacity/Throughput:	20.000 Tons/HR	STEEL PLATE
	64.500 MCF/HR	Natural Gas

Conditions for this source occur in the following groups: GRP 1
 RACT I VOC
 RACT II

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of filterable particulate matter, as measured by Method 5 of 40 CFR 60, Appendix A (or an equivalent method approved by the Department), from this source at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

002 [25 Pa. Code §123.21]**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source 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.

003 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall ensure that the total nitrogen oxides (NO_x) emissions from the following sources shall not exceed 176.68 tons per year:

- (a) Steckel Mill Furnaces "A" & "B" (Source ID: 154)
- (b) Slab Heating Furnaces #1 & #2 (Source ID: 110)
- (c) Rose Annealing Furnace (Source ID: 106)
- (d) Quench Furnace (Source ID: 102)
- (e) Temper Furnace (Source ID: 152)

004 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall limit the NO_x emissions from this Source ID to less than 36.84 tons per year calculated on a 12-month rolling sum.

[Compliance with this condition assures compliance with RACT I condition number 8]

Fuel Restriction(s).**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that only natural gas is used as fuel for the Rose Annealing Furnace (Source ID: 106).

**SECTION D. Source Level Requirements****Throughput Restriction(s).****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the maximum quantity of fuel used in the Rose Annealing Furnace (Source ID: 106) to 526,286 MCF of natural gas annually, calculated on a 12-month rolling sum.

[Compliance with this condition assures compliance with RACT I condition number 9]

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.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall monitor the fuel used by the Rose Annealing Furnace (Source ID: 106) on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall keep records of the amount of fuel used by the Rose Annealing Furnace (Source ID: 106) on a monthly basis.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain on site copies of the temperature monitoring records for a period of two (2) years and shall make these records available to the Department upon request. Such records may be maintained in electronic format.

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.**# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall calculate the nitrogen oxide (NOx) emissions by multiplying the annual usage of natural gas by the emission factor of 0.140 lb NOx/MCF of fuel used.

011 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional Authority for this permit condition was derived from 25 Pa. Code § 127.512 and 25 Pa. Code § 129.99]

The permittee shall ensure that the Rose Annealing Furnace (Source ID: 106) shall be maintained and operated in accordance with manufacturer's specifications and in accordance with good air pollution control practices.



SECTION D. Source Level Requirements

In the event that manufacturer specifications are not available, the permittee shall, on a biennially basis, conduct furnace checks and adjustments to include fuel to air ratio checks and subsequent adjustments are utilized to ensure proper and efficient operational performance and minimize emissions from the source.

(Compliance with this condition assures compliance with 25 Pa. Code Section 129.112(c)(2) and 25 Pa. Code Section 129.114(a)).

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. *****

**SECTION D. Source Level Requirements**

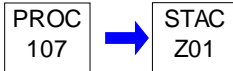
Source ID: 107

Source Name: STEEL PLATE ROLL PAINTING

Source Capacity/Throughput:

3.500 Gal/HR

COATINGS

**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.**# 001 [25 Pa. Code §129.52]****Surface coating processes**

(a) To assist in documenting the volatile organic compound (VOC) emissions and to demonstrate compliance with VOC emission and/or content limits, the permittee shall certify the composition of all coatings, paints and/or solvents used on this source, through Certified Product Data Sheets (CPDS), Material Safety Data Sheets (MSDS), and/or testing in accordance with EPA Method 24, as specified in 40 CFR Part 60, Appendix A, and as specified below; or through an alternative method which has been approved by the Department.

(b) The method(s) used to certify the VOC content, hazardous air pollutant (HAP) content, percent solids, and percent water shall adhere to the following parameters:

(1) CPDS. When a CPDS is supplied, there is no need to replicate testing to verify the accuracy of the CPDS; if the supplier used EPA Method 24 as a basis for the CPDS.

(2) MSDS. When the actual VOC and HAP emissions are less than 12.5 tons VOCs, and 5 tons of an individual HAP or 12.5 tons of the aggregate of HAPs, whichever is more restrictive, as calculated based on the upper bounds reported on the MSDS, no additional testing is required. Solvents used to dilute coatings and for cleanup must be included in the calculation.

(c) Testing of individual coatings, paints and/or solvents is required when any of the following conditions occurs:

(1) The facility is unable to comply with the requirements specified in paragraph (b)(1) and (b)(2) of this section.

(2) A CPDS is not supplied and, the actual VOC and HAP emissions from individual materials exceed 12.5 tons VOCs, 1.0 ton for any one HAP and 2.5 tons for any aggregate of HAPs.

(3) Results from the MSDS (when calculated to actual emissions) indicate VOCs greater than 12.5 tons.

(d) Whenever the levels in paragraph (c)(2) are exceeded in any on-going calendar year, and no CPDS is supplied, the material(s) must be tested during that year. From that point on, testing shall be conducted quarterly on at least 25% of the affected coatings, paints and/or solvents, and all materials shall be tested at least once per calendar year.

(e) All testing shall be done on an as-applied state.

(f) When the Department takes samples of coatings, paints and/or solvents, U.S. EPA Method 24 testing may be used to test the sample.

**SECTION D. Source Level Requirements****III. MONITORING REQUIREMENTS.****# 002 [25 Pa. Code §129.52]****Surface coating processes**

The permittee shall monitor the following parameters for each coating, thinner and other component, as supplied, on a daily or per job basis:

- (1) the volume used;
- (2) the mix ratio; and
- (3) the VOC content of each coating, thinner, and other component as supplied.
- (4) The VOC content of each as applied coating

IV. RECORDKEEPING REQUIREMENTS.**# 003 [25 Pa. Code §129.52]****Surface coating processes**

The permittee shall maintain records sufficient to demonstrate compliance 25 Pa. Code § 129.52. At a minimum, a facility shall maintain daily records of:

(a) The following parameters for each coating, thinner and other component as supplied:

- (1) The coating, thinner or component name and identification number.
- (2) The volume used.
- (3) The mix ratio.
- (4) The density or specific gravity.
- (5) The weight percent of total volatiles, water, solids and exempt solvents.
- (6) The volume percent of solids for Table I surface coating process categories 1--10.

(b) The VOC content of each coating, thinner and other component as supplied.

(c) The VOC content of each as applied coating.

The records required above, shall be recorded and maintained in a format and time frame consistent with, and approved by, the Department.

(d) The VOC content of the coatings shall either be provided by the manufacturer in Certified Product Data Sheets (CPDS), Material Safety Data Sheets (MSDS), per Dept. approved methods, or by appropriate EPA methods of testing.

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.**# 004 [25 Pa. Code §129.52]****Surface coating processes**

The permittee may not cause or permit the emission into the outdoor atmosphere of VOCs from this source(s) unless the weight of VOC content of each as applied coating is equal to or less than 6.67 pounds (lbs) of VOC per gallon of coating



SECTION D. Source Level Requirements

solids.

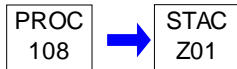
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 108

Source Name: PARTS WASHERS

Source Capacity/Throughput:	30.000 Gal/HR	SOLVENTS
	200.000 Lbs/HR	SOLVENTS

**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.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the solvent usage for all the parts degreasers at the facility on a material balance basis.

IV. RECORDKEEPING REQUIREMENTS.**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall maintain records of solvent usage for all the parts degreasers at the facility on a material balance basis. The records shall contain sufficient information to track volatile organic compound (VOC) emissions on a monthly basis.

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 §127.441]****Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 PA Code § 127.512(h).]

The VOC emissions from the Parts Degreasers (Source ID: 108) which have an opening greater than ten (10) square feet shall comply with 25 Pa. Code § 129.63 requirements.

[Note: This provision is applicable only to batch vapor cleaning machines.]

004 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional authority for this permit condition is also derived from 25 PA Code § 127.512(h).]

(a) Pursuant to the VOC Reasonably Available Control Technology (RACT) operating permit for this facility, the Parts Degreasers (Source ID: 108) which have an opening less than ten (10) square feet shall be maintained and operated in accordance with manufacturers' specifications or in accordance with good air pollution control practices.

(b) In instances where the manufacturer's specification information is no longer available or applicable, the permittee shall ensure that the sources shall be maintained and operated in a manner consistent with safety and good air pollution control

**SECTION D. Source Level Requirements**

practices for minimizing emissions.

005 [25 Pa. Code §129.63]**Degreasing operations**

(a) Except for those subject to the Federal National emissions standards for hazardous air pollutants (NESHAP) for halogenated solvent cleaners under 40 CFR Part 63 (relating to National emission standards for hazardous air pollutants for source categories), this subsection applies to cold cleaning machines that use 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.

(1) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.

(2) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall:

(i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (3). In addition, the label shall include the following discretionary good operating practices:

(A) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.

(B) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.

(C) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.

(ii) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.

(3) Cold cleaning machines shall be operated in accordance with the following procedures:

(i) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

(ii) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.

(iii) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.

(iv) Air agitated solvent baths may not be used.

(v) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.

(4) A person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.

(5) A person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:

(i) The name and address of the solvent supplier.

(ii) The type of solvent including the product or vendor identification number.

(iii) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).

**SECTION D. Source Level Requirements**

(6) A person who operates a cold cleaning machine shall maintain for at least 2 years and shall provide to the Department, on request, the information specified in paragraph (5). An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.

(7) Paragraph (4) does not apply:

- (i) To cold cleaning machines used in extreme cleaning service.
- (ii) If the owner or operator of the cold cleaning machine demonstrates, and the Department approves in writing, that compliance with paragraph (4) will result in unsafe operating conditions.
- (iii) To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.

VII. ADDITIONAL REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The following is a list of areas at the Conshohocken Plant that have sources subjected to the provisions of 25 Pa. Code § 129.63. The list may be changed based on the needs of facility operations and maintenance departments.

Name

- (1) Bearing Shop
- (2) Pipe Shop
- (3) Hydraulics Shop
- (4) Mechanical Shop
- (5) Electrical Shop
- (6) Fabrication Shop
- (7) Garage
- (8) Q & T Maintenance
- (9) SM hydraulics room
- (10) Iron City
- (11) CTL Maintenance

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

**SECTION D. Source Level Requirements**

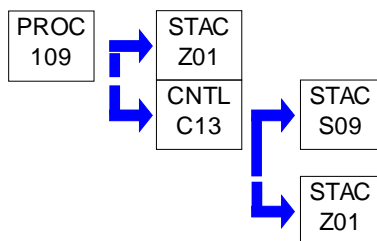
Source ID: 109

Source Name: SHOT BLASTING MACHINE & CARTRIDGE COLLECTOR SYSTEM

Source Capacity/Throughput:

12.500 Tons/HR

STEEL PLATE

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall ensure that the particulate matter emissions from the Shot Blasting Machine & Cartridge Collector System (Source ID: 109) shall be controlled by the Camfil Farr Dust Collector (Source ID: C13).

(b) The permittee shall ensure that the particulate matter emissions from the Camfil Farr Dust Collector (Source ID: C13) shall not exceed an outlet concentration of 0.02 grains per dry standard cubic feet.

[Compliance with this streamlined condition also assures compliance with 25 Pa. Code 123.13(c)(1)(i).]

002 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The opacity emitted from the Camfil Farr Dust Collector (Source ID: C13) shall not exceed the following limits:

- (1) 20% for a period or periods aggregating more than three (3) minutes in any one (1) hour.
- (2) 60% at any time.

[Compliance with this streamlined condition also assure compliance with 25 Pa. Code § 123.41.]

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.**# 003 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) The permittee shall use the approved process parameter or indicator to obtain data and monitor the emission control equipment performance:

- (i) The pressure drop across the Camfil Farr Dust Collector (Source ID: C13) using the electronic pressure gauge.

(b) In the event of a defective or malfunctioning monitoring device (e.g., electronic pressure gauge), the permittee shall use one of the following approved process parameters or indicator to obtain data and monitor the emission control equipment performance:

**SECTION D. Source Level Requirements**

- (i) The pressure drop across the Camfil Farr Dust Collector (Source ID: C13) using the magnehelic pressure gauge; or,
- (ii) The opacity using a certified Method 22.

004 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- (a) The permittee shall monitor, as a daily average, the pressure drop using the electronic pressure gauge, whenever the source and control device are operating.
- (b) In the event of a defective or malfunctioning monitoring device (e.g., electronic pressure gauge), whenever the source and control device are operating, the permittee shall monitor:
 - (1) the pressure drop using the magnehelic gauge once per operating day; or,
 - (2) the opacity using a Method 22 visual determination on a daily basis.

IV. RECORDKEEPING REQUIREMENTS.**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The permittee shall record, as a daily average, the approved indicator using approved data collecting device.
 - (i) The pressure drop across the Camfil Farr Dust Collector (Source ID: C13) using the electronic pressure gauge.
- (b) In the event of a defective or malfunctioning monitoring device (e.g., electronic pressure gauge), the permittee shall record the approved indicator to using the following approved data collecting device:
 - (i) The drop across across the Camfil Farr Dust Collector (Source ID: C13) using the magnehelic pressure gauge once per operating day; or,
 - (ii) The opacity, using a Method 22 visual determination, on a daily basis.

006 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- (a) The company shall keep a record of all stack tests conducted for the Shot Blasting Machine & Cartridge Collector System (Source ID: 109) and Camfil Farr Dust Collector (Source ID: C13).
- (b) The company shall keep a copy of the manufacturer's specifications for the Camfil Farr Dust Collector (Source ID: C13).

007 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall keep all records for a period of five (5) years and make the records available to the Department upon request.

008 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

- (1) The permittee shall record all excursions and corrective actions taken in response to an excursion and the time elapsed until the corrective actions have been taken.
- (2) The permittee shall record all inspections, repair and maintenance performed on the monitoring equipment.
- (3) The permittee shall maintain records of all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). The permittee shall also record the dates, times and durations, possible causes and corrective actions taken for the incidents.

**SECTION D. Source Level Requirements****V. REPORTING REQUIREMENTS.****# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall report all excursions and corrective actions taken, the dates, times, durations and possible causes, every six (6) months.

010 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall report all monitoring downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable), their dates, times and durations, possible causes and corrective actions taken, every six (6) months.

VI. WORK PRACTICE REQUIREMENTS.**# 011 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

- (a) The Camfil Farr Dust Collector (Source ID: C13) shall be on and operating properly during all manufacturing processes.
- (b) The company shall keep on hand a sufficient quantity spare cartridge filters on site to be able to immediately replace any damage due to normal use or wear.
- (c) Collected particulate from Camfil Farr Dust Collector (Source ID: C13) shall be discharged into enclosed containers through airlock valves.
- (d) The permittee shall maintain all monitoring equipment and stock parts necessary for routine repairs onsite.

012 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall adhere to the approved range for the selected indicator, listed below, so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion.

(i) Based on the electronic pressure gauge readings, the pressure drop across the Camfil Farr Dust Collector (Source ID: C13) shall not exceed 7.0 inches w.g., as a daily average.

(b) In the event of a defective or malfunctioning monitoring device (e.g., electronic pressure gauge), the permittee shall adhere to the approved range for the selected indicator, listed below, so that operation within the range shall provide reasonable assurance of compliance. A departure from the specified indicator range over a specified averaging period shall be defined as an excursion.

(i) Based on the magnehelic pressure gauge readings, the pressure drop across the Camfil Farr Dust Collector (Source ID: C13) shall not exceed 7.0 inches w.g., once per operating day; or,

(ii) Based on Method 22 visual determination, there shall be no visible opacity at the exist end of the stack.

013 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

(a) The permittee shall use the approved means or devices to measure the applicable indicators.

(i) The Camfil Farr Dust Collector (Source ID: C13) shall be equipped with a device for monitoring the pressure drop across the unit.

(b) In the event of a defective or malfunctioning monitoring device (e.g., electronic pressure gauge), the permittee shall use the approved means or devices to measure the applicable indicators.

(i) The Camfil Farr Dust Collector (Source ID: C13) shall be equipped with a magnehelic pressure gauge for monitoring

**SECTION D. Source Level Requirements**

the pressure drop across the unit; or,

(ii) A trained Method 22 visual determination of opacity.

VII. ADDITIONAL REQUIREMENTS.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The control device associated with the Shot Blasting Machine & Cartridge Collector System (Source ID: 109) is the Camfil Farr Dust Collector (Source ID: C13).

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

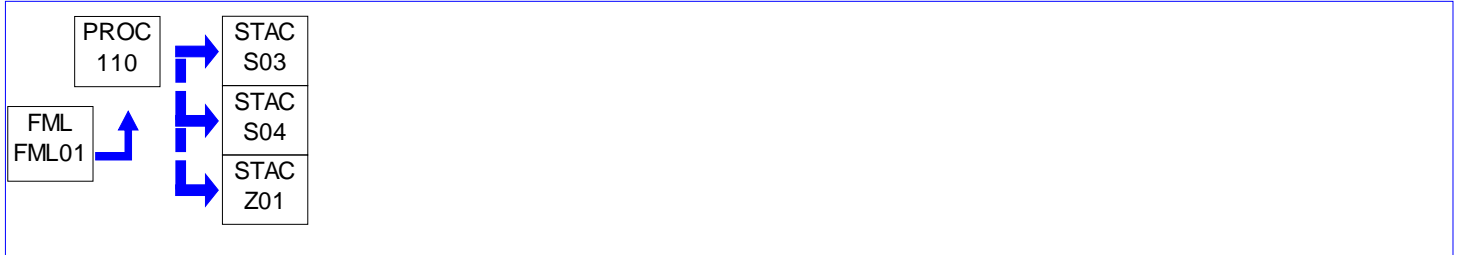
**SECTION D. Source Level Requirements**

Source ID: 110

Source Name: SLAB HEATING FURNACES 1 & 2

Source Capacity/Throughput:	200.000 Tons/HR	STEEL SLABS
	208.000 MCF/HR	Natural Gas

Conditions for this source occur in the following groups: GRP 1
 RACT I VOC
 RACT II

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of filterable particulate matter, as measured by Method 5 of 40 CFR 60, Appendix A (or an equivalent method approved by the Department), from this source at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

002 [25 Pa. Code §123.21]**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source 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.

003 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall ensure that the total combined nitrogen oxides (NO_x) emissions from the following sources shall not exceed 176.68 tons per year:

- (a) Steckel Mill Furnaces "A" & "B" (Source ID: 154)
- (b) Slab Heating Furnaces 1 & 2 (Source ID: 110)
- (c) Rose Annealing Furnace (Source ID: 106)
- (d) Quench Furnace (Source ID: 102)
- (e) Temper Furnace (Source ID: 152)

004 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall limit the NO_x emissions from Slab Heating Furnace 1 to less than 85.97 tpy and from Slab Heating Furnace 2 to less than 99.9 tpy calculated on a 12-month rolling sum.

[Compliance with this condition assures compliance with RACT I condition number 8]

Fuel Restriction(s).**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall only burn natural gas as the primary fuel for Slab Heating Furnaces 1 & 2 (Source ID: 110).

**SECTION D. Source Level Requirements****Throughput Restriction(s).****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the quantity of fuel burned in these sources as follows:

- (a) Slab Heating Furnace 1: 1,563,901 MCF annually, as a 12-month rolling sum.
- (b) Slab Heating Furnace 2: 1,821,848 MCF annually, as a 12-month rolling sum.

[Compliance with this condition assures compliance with RACT I condition number 9]

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.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall monitor the fuel used by Slab Heating Furnaces 1 and 2 (Source ID: 110) on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall keep separate records of the amount of fuel used by Slab Heating Furnaces 1 & 2 (Source ID: 110) on a monthly basis.

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.**# 009 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition was derived from 25 Pa. Code § 127.512 and 25 Pa. Code § 129.99]

The permittee shall ensure that the Slab Heating Furnace 1 & 2 (Source ID: 110) shall be maintained and operated in accordance with manufacturer's specifications and in accordance with good air pollution control practices.

In the event that manufacturer specifications are not available, the permittee shall, on a biennially basis, conduct furnace checks and adjustments to include fuel to air ratio checks and subsequent adjustments are utilized to ensure proper and efficient operational performance and minimize emissions from the source.

[Compliance with this condition assures compliance with 25 Pa. Code § 129.114(a)]

010 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

**SECTION D. Source Level Requirements**

The permittee shall calculate the nitrogen oxide (NO_x) emissions by multiplying the annual usage of natural gas by the following emission factor for each source:

(a) Slab Heating Furnace 1: 0.11 lb NO_x/MCF for natural gas;

(b) Slab Heating Furnace 2: 0.198 lb NO_x/MCF of natural gas;

[Compliance with this condition assures compliance with RACT I condition number 9]

VII. ADDITIONAL REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

(a) This source consists of the following individual sources:

(1) Slab Heating Furnace 1: rated heat input - 178.5 MMBtu/hr.

(2) Slab Heating Furnace 2: rated heat input - 248 MMBtu/hr.

(b) The source capacity/throughput values listed for this source in Section A & D are the maximum values for each individual source.

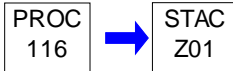
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 116

Source Name: 1000 GAL GASOLINE STORAGE TANK

Source Capacity/Throughput: 1,000.000 Gal/HR GASOLINE

**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.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the throughput of gasoline for the 1,000-Gal. Gasoline Storage Tank (Source ID: 116) on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep records of the VOC and HAP emissions from this Source ID (116) monthly and on a 12-month rolling sum.

003 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall maintain records of the gasoline throughput for the 1,000-Gal. Gasoline Storage Tank (Source ID: 116) in order to calculate emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

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 D. Source Level Requirements**

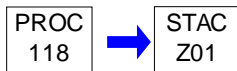
Source ID: 118

Source Name: MAINTENANCE ACTIVITIES/ MISC VOC'S

Source Capacity/Throughput:

15.000 Lbs/HR

SOLVENTS

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall limit the VOC emissions for each operation associated under this source ID to less than 2.7 tons per year calculated on a 12-month rolling sum.

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 §127.441]

Operating permit terms and conditions.

The permittee shall calculate the VOC emissions for each operation associated under this Source ID.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records for this source ID (118) necessary to calculate and record the VOC emissions to demonstrate compliance with the VOC emission limit of 2.7 tpy calculated on a 12-month rolling sum for each operation associated under this Source ID.

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.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

This Source ID 118 (Maintenance Activities/Misc VOC's) is comprised of the following operations:

- Marking Activities
- Misc Activities

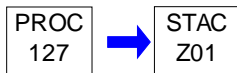
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 127

Source Name: 4-HI ROLLING MILL

Source Capacity/Throughput: 172.000 Tons/HR STEELPLATES

**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).

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

**SECTION D. Source Level Requirements**

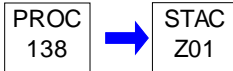
Source ID: 138

Source Name: IDENTIFICATION MARKING

Source Capacity/Throughput:

3.000 Gal/HR

COATING

**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.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

(a) To assist in documenting the volatile organic compound (VOC) emissions and to demonstrate compliance with VOC emission and/or content limits, the permittee shall certify the composition of all coatings, paints and/or solvents used on this source, through Certified Product Data Sheets (CPDS), Material Safety Data Sheets (MSDS), and/or testing in accordance with EPA Method 24, as specified in 40 CFR Part 60, Appendix A, and as specified below; or through an alternative method which has been approved by the Department.

(b) The method(s) used to certify the VOC content, hazardous air pollutant (HAP) content, percent solids, and percent water shall adhere to the following parameters:

(1) CPDS. When a CPDS is supplied, there is no need to replicate testing to verify the accuracy of the CPDS; if the supplier used EPA Method 24 as a basis for the CPDS.

(2) MSDS. When the actual VOC and HAP emissions are less than 12.5 tons VOCs, and 5 tons of an individual HAP or 12.5 tons of the aggregate of HAPs, whichever is more restrictive, as calculated based on the upper bounds reported on the MSDS, no additional testing is required. Solvents used to dilute coatings and for cleanup must be included in the calculation.

(c) Testing of individual coatings, paints and/or solvents is required when any of the following conditions occurs:

(1) The facility is unable to comply with the requirements specified in paragraph (b)(1) and (b)(2) of this section.

(2) A CPDS is not supplied and, the actual VOC and HAP emissions from individual materials exceed 12.5 tons VOCs, 1.0 ton for any one HAP and 2.5 tons for any aggregate of HAPs.

(3) Results from the MSDS (when calculated to actual emissions) indicate VOCs greater than 12.5 tons.

(d) Whenever the levels in paragraph (c)(2) are exceeded in any on-going calendar year, and no CPDS is supplied, the material(s) must be tested during that year. From that point on, testing shall be conducted quarterly on at least 25% of the affected coatings, paints and/or solvents, and all materials shall be tested at least once per calendar year.

(e) All testing shall be done on an as-applied state.

(f) When the Department takes samples of coatings, paints and/or solvents, U.S. EPA Method 24 testing may be used to test the sample.

**SECTION D. Source Level Requirements****III. MONITORING REQUIREMENTS.****# 002 [25 Pa. Code §129.52]****Surface coating processes**

The permittee shall monitor the following parameters for each coating, thinner and other component, as supplied, on a daily or per job basis:

- (1) the volume used;
- (2) the mix ratio; and
- (3) the VOC content of each coating, thinner, and other component as supplied.
- (4) The VOC content of each as applied coating

IV. RECORDKEEPING REQUIREMENTS.**# 003 [25 Pa. Code §129.52]****Surface coating processes**

The permittee shall keep records sufficient to demonstrate compliance 25 Pa. Code § 129.52. At a minimum, a facility shall maintain daily records of:

- (a) The following parameters for each coating, thinner and other component as supplied:
 - (1) The coating, thinner or component name and identification number.
 - (2) The volume used.
 - (3) The mix ratio.
 - (4) The density or specific gravity.
 - (5) The weight percent of total volatiles, water, solids and exempt solvents.
 - (6) The volume percent of solids for Table I surface coating process categories 1--10
- (b) The VOC content of each coating, thinner and other component as supplied.
- (c) The VOC content of each as applied coating.
- (d) Daily clean-up solvents usage, and it's VOC content and solvent density.

The records required above, shall be recorded and maintained in a format and time frame consistent with, and approved by, the Department.

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.**# 004 [25 Pa. Code §129.52]****Surface coating processes**

The permittee shall not cause or permit the emission into the outdoor atmosphere of VOCs from this source(s) unless the weight of VOC content of each as applied coating is equal to or less than 6.67 pounds (lbs) of VOC per gallon of coating solids.



SECTION D. Source Level Requirements

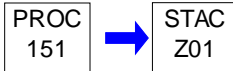
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 151

Source Name: STECKEL ROLLING MILL

Source Capacity/Throughput: 172.000 Tons/HR COILED STEEL

**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).

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

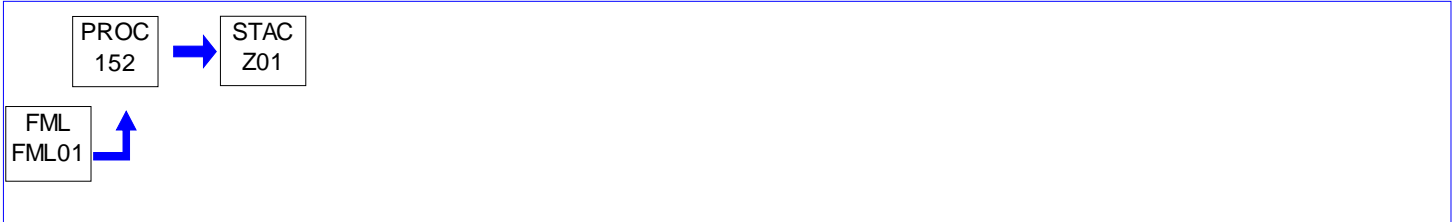
**SECTION D. Source Level Requirements**

Source ID: 152

Source Name: TEMPER FURNACE

Source Capacity/Throughput:	20.000 Tons/HR	STEEL PLATE
	94.000 MCF/HR	Natural Gas

Conditions for this source occur in the following groups: GRP 1
 RACT I VOC
 RACT II

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of filterable particulate matter, as measured by Method 5 of 40 CFR 60, Appendix A (or an equivalent method approved by the Department), from this source at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

002 [25 Pa. Code §123.21]**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source 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.

003 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall ensure that the total combined nitrogen oxides (NO_x) emissions from the following sources shall not exceed 176.68 tons per year:

- (a) Steckel Mill Furnaces "A" & "B" (Source ID: 154)
- (b) Slab Heating Furnaces #1 & #2 (Source ID: 110)
- (c) Rose Annealing Furnace (Source ID: 106)
- (d) Quench Furnace (Source ID: 102)
- (e) Temper Furnace (Source ID: 152)

004 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall limit the NO_x emissions from this Source ID to less than 19.78 tpy calculated on a 12-month rolling sum.

[Compliance with this condition assures compliance with RACT I condition number 8]

Fuel Restriction(s).**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that only natural gas is used as fuel for the Temper Furnace (Source ID: 152).

**SECTION D. Source Level Requirements****Throughput Restriction(s).****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the fuel usage in the Temper Furnace (Source ID: 152) to 282,839 MCF of natural gas per year, as a 12-month rolling sum.

[Compliance with this condition assures compliance with RACT I condition number 9]

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.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall monitor the fuel used by the Temper Furnace (Source ID: 152) on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep on site, copies of the temperature monitoring records. Such records may be maintained in electronic format.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall keep records of the amount of fuel used by the Temper Furnace (Source ID: 152) on a monthly basis.

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.**# 010 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition is derived from 25 Pa. Code 127.512 and 25 Pa. Code 129.99]

The permittee shall calculate the nitrogen oxide (NOx) emissions by multiplying the annual usage of natural gas and/or propane by the emission factor of 0.100 lb NOx/MCF of fuel used.

011 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

[Additional Authority for this permit condition was derived from 25 Pa. Code § 127.512 and 25 Pa. Code § 129.99]

The permittee shall ensure that the Temper Furnance (Source ID: 152) shall be maintained and operated in accordance with manufacturer's specifications or in accordance with good air pollution control practices.

[Compliance with this condition assures compliance with 25 Pa. Code § 129.114(a)]



SECTION D. Source Level Requirements

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).

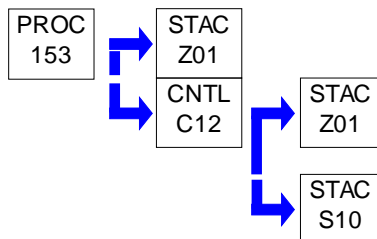
***** Permit Shield in Effect. *****

**SECTION D. Source Level Requirements**

Source ID: 153

Source Name: CUT-TO-LENGTH LINE & BAGHOUSE

Source Capacity/Throughput: 100.000 Tons/HR STEEL PLATE

**I. RESTRICTIONS.****Emission Restriction(s).**

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa Code § 127.512(h).]

The permittee shall ensure that the emission of particulate matter to the atmosphere from the Cut-To-Length Line (Source ID: 153) shall be less than 0.01 grains per dry standard cubic feet, 2.6 pounds per hour, and 11.39 tons per year (tpy).

[Compliance with streamlined condition also assures compliance with 25 Pa. Code § 123.13(c)(1)(i)]

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 §127.441]

Operating permit terms and conditions.

The permittee shall monitor the pressure drop across the Cut-To-Length Line Baghouse (Source ID: C12) on a weekly basis.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of the pressure drop readings across the Cut-To-Length Line Baghouse (Source ID: C12) on a weekly basis.

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 §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from 25 Pa. Code § 127.512(h).]

(a) The permittee shall ensure that the pressure drop across the Cut-To-Length Line Baghouse (Source ID: C12) is

**SECTION D. Source Level Requirements**

maintained between 0.5 and 8.0 inches water gauge (w.g.) and shall ensure that the control system shall not be bypassed.

- (b) The Cut-To-Length Line Baghouse (Source ID: C12) must be equipped with a device for monitoring the pressure differential across the unit.
- (c) The Cut-To-Length Line Baghouse (Source ID: C12) shall be cleaned by reverse pulse jet. Cleaning shall initiate when appropriate between the pressure drops of 2.0 - 7.0 inches water gauge (w.g.).
- (d) The permittee shall ensure that at all times the Cut-To-Length Line Baghouse (Source ID: C12) shall contain 64 cartridges.
- (e) The permittee shall maintain sufficient number of spare cartridges for replacement, as needed.
- (f) The stack height shall be 23.3 feet with test points located such that tests can be carried out as per Chapter 139 of the Rules and Regulations, when testing is required.

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. *****

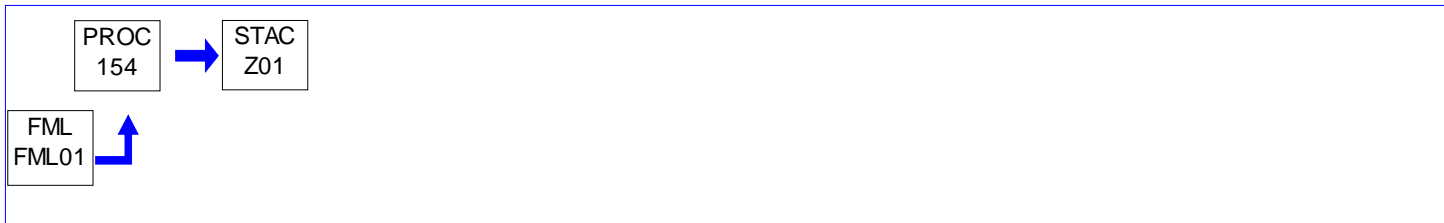
**SECTION D. Source Level Requirements**

Source ID: 154

Source Name: STECKEL MILL FURNACES "A" & "B"

Source Capacity/Throughput:	170.000 Tons/HR	STEEL SLABS
	24.000 MCF/HR	Natural Gas

Conditions for this source occur in the following groups: GRP 1

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of filterable particulate matter, as measured by Method 5 of 40 CFR 60, Appendix A (or an equivalent method approved by the Department), from this source at any time, in excess of 0.04 grains per dry standard cubic foot, pursuant to 25 Pa. Code § 123.13(c)(1)(i).

002 [25 Pa. Code §123.21]**General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from a source 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.

003 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall ensure that the total combined nitrogen oxides (NO_x) emissions from the following sources shall not exceed 176.68 tons per year:

- (a) Steckel Mill Furnaces "A" & "B" (Source ID: 154)
- (b) Slab Heating Furnaces #1 & #2 (Source ID: 110)
- (c) Rose Annealing Furnace (Source ID: 106)
- (d) Quench Furnace (Source ID: 102)
- (e) Temper Furnace (Source ID: 152)

Fuel Restriction(s).**# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall ensure that only natural gas is used as fuel for the Steckel Mill Furnaces "A" & "B" (Source ID: 154).

Throughput Restriction(s).**# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall limit the the fuel usage to 8,718 MCF per month (average monthly), and 104,618 MCF annually, for the Steckel Mill Furnaces "A" & "B" (Source ID: 154).

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).

**SECTION D. Source Level Requirements****III. MONITORING REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the fuel used by the Steckel Mill Furnaces "A" & "B" (Source ID: 154) on a monthly basis.

IV. RECORDKEEPING REQUIREMENTS.**# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep records of the amount of fuel used by the Steckel Mill Furnaces "A" & "B" (Source ID: 154) on a monthly basis.

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.**# 008 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall determine compliance with the annual nitrogen oxide (NO_x) emission limit by multiplying the annual usage of natural gas by the emission factor of 0.08 lb NO_x/MCF of fuel used.

009 [25 Pa. Code §127.441]**Operating permit terms and conditions.**

The permittee shall ensure that the Steckel Mill Furnaces "A" & "B" (Source ID: 154) shall be maintained and operated in accordance with manufacturer's specifications or in accordance with good air pollution control practices.

(Compliance with this condition assures compliance with 25 Pa. Code Section 129.112(c)(1)).

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. *****

**SECTION E. Source Group Restrictions.**

Group Name: GRP 1

Group Description: Furnance Monitoirng and Recordkeeping Conditions

Sources included in this group

ID	Name
102	QUENCH FURNACE
106	ROSE ANNEALING FURNACE
110	SLAB HEATING FURNACES 1 & 2
152	TEMPER FURNACE
154	STECKEL MILL FURNACES "A" & "B"

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.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall monitor the total NOx emissions from the following sources on a monthly and a 12-month rolling sum:

- (a) Steckel Mill Furnaces "A" & "B" (Source ID: 154)
- (b) Slab Heating Furnaces 1 & 2 (Source ID: 110)
- (c) Rose Annealing Furnace (Source ID: 106)
- (d) Quench Furnace (Source ID: 102)
- (e) Temper Furnace (Source ID: 152)

IV. RECORDKEEPING REQUIREMENTS.**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The permittee shall keep records of the combined NOx emissions from the following sources monthly and on a 12-month rolling sum:

- (a) Steckel Mill Furnaces "A" & "B" (Source ID: 154)
- (b) Slab Heating Furnaces 1 & 2 (Source ID: 110)
- (c) Rose Annealing Furnace (Source ID: 106)
- (d) Quench Furnace (Source ID: 102)
- (e) Temper Furnace (Source ID: 152)

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 E. Source Group Restrictions.**

Group Name: RACT I VOC

Group Description: Emission limit, monitoring and recordkeeping conditions

Sources included in this group

ID	Name
033	3-EMERGENCY DIESEL GENERATORS
102	QUENCH FURNACE
106	ROSE ANNEALING FURNACE
110	SLAB HEATING FURNACES 1 & 2
152	TEMPER FURNACE

I. RESTRICTIONS.**Emission Restriction(s).**

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The potential to emit volatile organic compounds (VOC's) from each of the following sources listed under this Source ID shall never exceed 3 lb/hr (daily average), 15 lb/day (daily average) and 2.7 tpy (calculated on a 12-month rolling sum).

NOTE: Should any of these limitations ever be exceeded, a detailed RACT analysis which meets the criteria specified in Section 129.92 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection must be submitted to the Department for each source category.

[Compliance with this condition assures compliance with RACT I condition number 10]

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 §127.441]

Operating permit terms and conditions.

The permittee shall calculate the VOC emissions from this Source ID in lb/hr (daily average), lb/day (daily average) and tons per year (calculated on a 12-month rolling sum).

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall keep records of the VOC emissions from this Source ID monthly and on a 12-month rolling sum.

The monthly VOC emission records shall demonstrate compliance with the lb/hr (daily average), lb/day (daily average) and the ton per year (based on 12-month rolling sum) emission limits.

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).

**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).

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

**SECTION E. Source Group Restrictions.**

Group Name: RACT II

Group Description: Recordkeeping and Monitoring

Sources included in this group

ID	Name
102	QUENCH FURNACE
106	ROSE ANNEALING FURNACE
110	SLAB HEATING FURNACES 1 & 2
152	TEMPER FURNACE

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.**# 001 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition was derived from 25 Pa. Code § 127.512 and 25 Pa. Code § 129.99]

The permittee shall calculate the NO_x emissions from this source ID monthly and on a 12-month rolling sum.

IV. RECORDKEEPING REQUIREMENTS.**# 002 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional Authority for this permit condition was derived from 25 Pa. Code § 127.512 and 25 Pa. Code § 129.99]

The permittee shall keep records of the NO_x emissions from this source ID monthly and on a 12-month rolling sum.

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.**

Source Id	Source Description		
033	3-EMERGENCY DIESEL GENERATORS		
Emission Limit			
0.040	gr/DRY FT3	Particulate Matter	TSP
2.700	Tons/Yr		VOC
3.000	Lbs/Hr		VOC
15.000	Lbs/Day		VOC
102	QUENCH FURNACE		
Emission Limit			
50.550	Tons/Yr	calculated on 12-month rolling sum	NOX
176.680	Tons/Yr	total for 102, 106, 110, 152 & 154	NOX
500.000	PPMV	dry basis	SOX
0.040	gr/DRY FT3	Particulate Matter	TSP
2.700	Tons/Yr		VOC
3.000	Lbs/Hr		VOC
15.000	Lbs/Day		VOC
106	ROSE ANNEALING FURNACE		
Emission Limit			
36.840	Tons/Yr	calculated on a 12-month rolling sum	NOX
176.680	Tons/Yr	total for 102, 106, 110, 152 & 154	NOX
500.000	PPMV	dry basis	SOX
0.040	gr/DRY FT3	Particulate Matter	TSP
2.700	Tons/Yr		VOC
3.000	Lbs/Hr		VOC
15.000	Lbs/Day		VOC
109	SHOT BLASTING MACHINE & CARTRIDGE COLLECTOR SYSTEM		
Emission Limit			
0.020	gr/DRY FT3	Particulate Matter	TSP
110	SLAB HEATING FURNACES 1 & 2		
Emission Limit			
85.970	Tons/Yr	Slab Heating Furnace 1 calculated on 12 month rolling sum	NOX
99.900	Tons/Yr	Slab Heating Furnace 2 calculated on a 12 month rolling sum	NOX
176.680	Tons/Yr	total for 102, 106, 110, 152, and 154	NOX
500.000	PPMV	dry basis	SOX
0.040	gr/DRY FT3	Particulate Matter	TSP
2.700	Tons/Yr		VOC
3.000	Lbs/Hr		VOC
15.000	Lbs/Day		VOC

**SECTION G. Emission Restriction Summary.**

Source Id	Source Description		
152	TEMPER FURNACE		
Emission Limit		Pollutant	
19.780	Tons/Yr	calculated on 12 month rolling sum	NOX
176.680	Tons/Yr	total for 102, 106, 110, 152, and 154	NOX
500.000	PPMV	dry basis	SOX
0.040	gr/DRY FT3	Particulate Matter	TSP
2.700	Tons/Yr		VOC
3.000	Lbs/Hr		VOC
15.000	Lbs/Day		VOC
153	CUT-TO-LENGTH LINE & BAGHOUSE		
Emission Limit		Pollutant	
0.010	gr/DRY FT3	Particulate Matter	TSP
2.600	Lbs/Hr	Particulate Matter	TSP
11.390	Tons/Yr	Particulate Matter	TSP
154	STECKEL MILL FURNACES "A" & "B"		
Emission Limit		Pollutant	
176.680	Tons/Yr	total for 102, 106, 110, 152, and 154	NOX
500.000	PPMV	dry basis	SOX
0.040	gr/DRY FT3	Particulate Matter	TSP

Site Emission Restriction Summary

Emission Limit		Pollutant
10.000 Tons/Yr	Single HAP emission less than 10 tpy calculated on 12-month rolling sum	Hazardous Air Pollutants
25.000 Tons/Yr	Combined HAP emission less than 25 tpy calculated on 12-month rolling sum	Hazardous Air Pollutants

**SECTION H. Miscellaneous.**

(a) The following sources have been determined to be of minor significance with respect to emissions of air pollutants. They are still subject to 25 Pa. Code §§ 123.2, 123.31, and 123.41, relating to fugitive particulate matter, malodors, and visible emission restrictions, respectively. If the permittee or the SERO determines that particulate matter emissions need to be controlled to comply with 25 Pa. Code § 123.2, the permittee shall take appropriate measures after approval by the Department pursuant to 25 Pa. Code § 123.1(c).

- (1) one (1) 8,000 gal. aboveground diesel fuel tank
- (2) one (1) 275 gal. aboveground diesel fuel tanks
- (3) two (2) 500 gal. aboveground diesel fuel tanks
- (4) four (4) propane back-up fuel storage tank (removed summer 2014)
- (5) roll grinding
- (6) rolling - two (2) slab furnace cooling towers
- (7) rolling - laminar flow sprays
- (8) rolling - scale pit storage
- (9) rolling - descale box
- (10) heat treating quench cooling towers
- (11) water treatment plant and associated waste handling
- (12) sludge lagoon
- (13) construction and maintenance paint
- (14) rolling - motor room cooling towers
- (15) finishing shear line
- (16) finishing hydraulic shear (P-Shear)
- (17) plate oiling
- (18) hand grinding throughout plant
- (19) welding operations throughout plant
- (20) portable grinders
- (21) power washing
- (22) slab extractors
- (23) ethylene glycol at compressed air station
- (24) steckel mill shear
- (25) on-line grinding (Q & T)
- (26) hot and cold levelers
- (27) plasma arc cutting with dedicated fume collectors
- (28) one (1) WWTP emergency pump rated at 1.26 MMBtu/hr
- (29) small space heaters (< 1 MMBtu/hr)
- (30) one (1) 1.5 MMBtu/hr propane vaporizer
- (31) chemolene flame cutting
- (32) six (6) evaporative water cooling units/towers
- (33) water sprays used to cool hot steel plate (steam emissions)
- (34) scale loadout station (< 1.0 TPY PM10 - scale is wet)
- (35) steckel mill furnaces (4 ultralow NOx burner replacements - RFD# A01-46-2353)
- (36) temper mill furnaces (burner replacements - RFD# A01-46-2231)
- (37) slab heating furnaces (preheater replacement - RFD # A01-2216)
- (38) sludge dewatering activities
- (39) 4-Hi rolling mill (Source ID: 127)

(b) The following list of sources (e.g., storage vessels for volatile organic compounds, which do not contain hazardous air pollutants, which have capacities less than 10,000 gallons) are determined to be exempt, in accordance with 127.14(a)(8)(15), to be exempt from Plan Approval requirements of 127.11 and 127.12:

- (1) One (1) 275-gallon diesel storage tank (Tank #3)
- (2) One (1) 1,200-gallon lube oil recirculation process tank (Tank #5A)
- (3) Two (2) 4,000-gallon lube oil recirculation process tanks (Tanks #5B)
- (4) Two (2) 3,000-gallon lube oil recirculation process tanks (Tanks #5C)
- (5) One (1) 1,000-gallon lube oil recirculation process tank (Tank #5D)
- (6) One (1) 800-gallon hydraulic fluid recirculation process tank (Tank #5E)
- (7) One (1) 60-gallon hydraulic fluid recirculation process tank (Tank #5F)
- (8) One (1) 75-gallon lube oil recirculation process tank (Tank #5G)
- (9) One (1) 500-gallon and one (1) 1,500-gallon hydraulic fluid recirculation process tanks (Tanks #9A)

**SECTION H. Miscellaneous.**

- (10) One (1) 1,000-gallon hydraulic fluid recirculation process tank (Tank #9B)
- (11) One (1) 1,500-gallon hydraulic fluid recirculation process tank (Tank #9C)
- (12) One (1) 250-gallon and 500-gallon hydraulic fluid recirculation process tanks (Tanks #9D)
- (13) One (1) 1,000-gallon hydraulic fluid storage tank (Tank #9E)
- (14) One (1) 1,750-gallon hydraulic fluid recirculation process tank (Tank #10A)
- (15) One (1) 450-gallon hydraulic fluid recirculation process tank (Tank #10B)
- (16) One (1) 300-gallon hydraulic fluid recirculation process tank (Tank #10C)
- (17) One (1) 750-gallon hydraulic fluid recirculation process tank (Tank #11A)
- (18) One (1) 175-gallon hydraulic fluid recirculation process tank (Tank #11B)
- (19) One (1) 6,500-gallon hydraulic fluid storage tank (Tank #11C)
- (20) One (1) 300-gallon hydraulic fluid recirculation process tank (Tank #12)
- (21) One (1) 75-gallon diesel storage tank (Tank #16A)
- (22) Two (2) 30-gallon diesel storage tanks (Tanks #16B)
- (23) One (1) 7,644-gallon ferric chloride storage tank (Tank #17)

(c) The following previously issued Plan Approvals and Operating Permits serve as a basis for certain terms and conditions in this Title V Operating Permit:

- (1) RACT Permit: OP-46-0011
- (2) Operating Permit: 46-323-010
- (3) Operating Permit 46-307-006
- (4) Operating Permit 46-307-007
- (5) Operating Permit 46-302-196
- (6) Operating Permit 46-307-003
- (7) Plan Approval No. 46-0011D

(d) The data listed in Section A, Site Inventory List, for capacity and fuel/material and the source capacity descriptions and the permit maps in Section D are for descriptive purposes and are not considered as maximum source capacities or design limitations or enforceable conditions. Source limits are indicated in the text conditions of Section D and E and are listed in Section G of this Title V Operating Permit.

(e) If propane is used for more than 500 hours in any 12 consecutive month period, in any of the following sources below, then the permittee shall perform stack testing using propane on each of the affected sources to determine the NO_x emission factor(s). The permittee shall follow the Rules and Regulations of 25 Pa. Code Chapter 139 for the stack test(s):

- (1) Steckel Mill Furnaces A & B
- (2) Slab Reheating Furnaces No. 1 & 2
- (3) Rose Annealing Furnace
- (4) Quench Furnace
- (5) Temper Furnace

(f) When using propane, as back up fuel, in any of the sources listed above, the permittee shall submit, in writing to the Department, the NO_x emission factor used for the different furnaces. The permittee shall also state the source of the emission factor(s). The Department shall provide written comments on such submission.

(g) This Title V Operating Permit (APS No.: 556481, Auth ID: 596983) has been administratively amended to incorporate a Change of Ownership (COO) and Responsible Official.

(h) This Title V Operating Permit (APS No.: 564403, Auth ID: 607437) has been issued/transferred to correct a Change of Ownership (COO) discrepancy in eFACTS/AIMS.

(i) This Title V Operating Permit (APS No.: 556481, Auth ID: 620585) has been renewed.

(j) This Title V Operating Permit (APS No.: 564403, Auth ID: 721471) has been administratively amended to incorporate Plan Approval No. 46-0011D.

(k) This Title V Operating Permit (APS No.: 564403, Auth ID: 906452) has been renewed.

AUTH: 1156883 APS: 56452

**SECTION H. Miscellaneous.**

- This operating permit has been renewed and also addresses RACT II applicability and references in accordance with 25 Pa. Code 129.96-129.100

- The 1000 kW emergency generator listed under Source ID 033 has been removed from the facility and therefore 25 Pa. Code 129.203 & 129.204 are no longer applicable to this source ID.

- The FML propane tanks have been removed from the facility. All sources are now only capable of burning natural gas, so statements (e) and (f) above are no longer applicable. The conditions (e) and (f) will remain listed above just for informational purposes and for past history of the permit.

AUTH: 1354035 APS: 1038442

This operating permit has been amended to incorporate a name change from Arcelormittal to Cleveland Cliffs Plate LLC.

The amendment also includes the following changes:

- Source ID 109, the minimum pressure drop range has been removed on the baghouse

- Source ID 116, the name was changed from 4000 gallon tank to 1000 gallon tank as the 4000 gallon tank has been removed and replaced. Regulation 25 Pa. Code Section 129.61 has been removed as it applies to tanks greater than 2000 gallons.

APS: 10384442 AUTH: 1403351

- This Title V permit has been renewed.

- Source ID 101: Drever Furnace has been removed from the Permit. This Source is not used in any type of production and has been out of service since 2018.

- RFD 8580 was approved by the Department on June 29, 2020. The RFD allowed for the replacement of a 150 kw engine under Source ID 033 to be removed and replaced with a 200 kw engine.

- Per this permit renewal, the facility has been approved at this time to do monitoring of odors, visible emissions, and fugitive particulate matter (Section C, Condition #011) on a monthly basis. The Department reserves the right to change this frequency pursuant to Section C, Condition #011(e)

-In the event of a fuel meter malfunction, the facility shall calculate the actual fuel usage by using a fuel usage factor. The fuel usage factor (mcf/ton) is determined by averaging the amount of fuel used and the amount of steel processed in the previous three (3) months, then dividing the average fuel usage by the average steel processed.

APS: 1038442 AUTH: 1421276

Cleveland Cliffs Plate submitted a Significant Operating Permit Modification on December 22, 2022 in accordance with 25 Pa. Code § 129.114(d)(1)(i) to address Reasonably Available Control Technology (RACT III)



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