

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

# STATE ONLY OPERATING PERMIT

Issue Date: March 8, 2021 Effective Date: April 1, 2021

Expiration Date: March 31, 2026

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 unless otherwise designated.

State Only Permit No: 28-05050

Federal Tax Id - Plant Code: 25-1255934-1

Owner Information

Owner information	
Name: STRAIT STEEL INC Mailing Address: PO BOX 370	
GREENCASTLE, PA 17225-0370	
Plant Information	on
Plant: STRAIT STEEL INC/GREENCASTLE	
Location: 28 Franklin County	28905 Antrim Township
SIC Code: 1791 Construction - Structural Steel Erection	
Responsible Office	icial
Name: GREGORY A STRAIT	
Title: PRES	
Phone: (717) 597 - 3125 Ext.6601	
Permit Contact Per	erson
Name: RICK HOUCK	
Title: ENGINEER	
Phone: (717) 597 - 6617	
[Signature]	
WILLIAM R WEAVER SOUTHCENTRAL REGION AIR PROGRAMMA	ANAGER



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# **SECTION A. Table of Contents**

# Section A. Facility/Source Identification

Table of Contents Site Inventory List

# Section B. General State Only Requirements

4004	Dafinitions
#001	Definitions.

- #002 Operating Permit Duration.
- #003 Permit Renewal.
- #004 Operating Permit Fees under Subchapter I.
- #005 Transfer of Operating Permits.
- #006 Inspection and Entry.
- #007 Compliance Requirements.
- #008 Need to Halt or Reduce Activity Not a Defense.
- #009 Duty to Provide Information.
- #010 Revising an Operating Permit for Cause.
- #011 Operating Permit Modifications
- #012 Severability Clause.
- #013 De Minimis Emission Increases.
- #014 Operational Flexibility.
- #015 Reactivation
- #016 Health Risk-based Emission Standards and Operating Practice Requirements.
- #017 Circumvention.
- #018 Reporting Requirements.
- #019 Sampling, Testing and Monitoring Procedures.
- #020 Recordkeeping.
- #021 Property Rights.
- #022 Alternative Operating Scenarios.
- #023 Reporting
- #024 Report Format

### Section C. Site Level State Only Requirements

- C-I: Restrictions
- C-II: Testing Requirements
- C-III: Monitoring Requirements
- C-IV: Recordkeeping Requirements
- C-V: Reporting Requirements
- C-VI: Work Practice Standards
- C-VII: Additional Requirements
- C-VIII: Compliance Certification
- C-IX: Compliance Schedule

# Section D. Source Level State Only Requirements

- D-I: Restrictions
- D-II: Testing Requirements
- D-III: Monitoring Requirements
- D-IV: Recordkeeping Requirements
- D-V: Reporting Requirements
- D-VI: Work Practice Standards
- D-VII: Additional Requirements

Note: These same sub-sections are repeated for each source!

# Section E. Source Group Restrictions

E-I: Restrictions





# **SECTION A. Table of Contents**

E-II: Testing Requirements
E-III: Monitoring Requirements
E-IV: Recordkeeping Requirements
E-V: Reporting Requirements
E-VI: Work Practice Standards
E-VII: Additional Requirements

# Section F. Alternative Operating Scenario(s)

F-I: Restrictions

F-II: Testing Requirements
F-III: Monitoring Requirements
F-IV: Recordkeeping Requirements
F-V: Reporting Requirements
F-VI: Work Practice Standards
F-VII: Additional Requirements

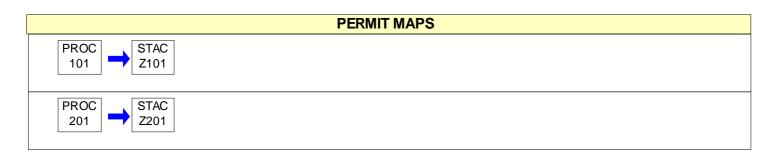
# Section G. Emission Restriction Summary

# Section H. Miscellaneous



# **SECTION A.** Site Inventory List

Source	ID Source Name	Capacity/Throughput	Fuel/Material
101	SURFACE COATING OPERATION	10.000 Lbs/HR	VOC
201	WELDING OPERATIONS	N/A	
Z101	SOURCE 101 FUGITIVE EMISSIONS		
Z201	SOURCE 201 FUGITIVE EMISSIONS		









# **SECTION B.** General State Only 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 in 25 Pa. Code § 121.1.

#002 [25 Pa. Code § 127.446]

**Operating Permit Duration.** 

- (a) 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.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating 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.

#003 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446 & 127.703(b)]

### Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. 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.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application as specified in 25 Pa. Code § 127.703(b). 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.
- (d) 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.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) 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 as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay the annual operating permit maintenance fee according to the following fee schedule in either paragraph (1) or (2) in accordance with 25 Pa. Code § 127.703(d) on or before December 31 of each year for the next calendar year.
  - (1) For a synthetic minor facility, a fee equal to:
    - (i) Four thousand dollars (\$4,000) for calendar years 2021—2025.
    - (ii) Five thousand dollars (\$5,000) for calendar years 2026—2030.
    - (iii) Six thousand three hundred dollars (\$6,300) for the calendar years beginning with 2031.

28-05050 STRAIT STEEL INC/GREENCASTLE

# **SECTION B.** General State Only Requirements

- (2) For a facility that is not a synthetic minor, a fee equal to:
  - (i) Two thousand dollars (\$2,000) for calendar years 2021—2025.
  - (ii) Two thousand five hundred dollars (\$2,500) for calendar years 2026—2030.
  - (iii) Three thousand one hundred dollars (\$3,100) for the calendar years beginning with 2031.
- (b) 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.

#### #005 [25 Pa. Code §§ 127.450 (a)(4) and 127.464]

# **Transfer of Operating Permits.**

- (a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.
- (b) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership of the source shall be treated as an administrative amendment if the Department determines that no other change in the permit is required and 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 a compliance review form has been submitted to, and the permit transfer has been approved by, the Department.
- (c) This operating permit is valid only for those specific sources and the specific source locations described in this

#### #006 [25 Pa. Code § 127.441 and 35 P.S. § 4008]

### Inspection and Entry.

- (a) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Department or authorized representatives of the Department to perform the following:
- (1) Enter at reasonable times upon the permittee's premises where a 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, at reasonable times, any records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, any 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, any 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 or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.
- (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.

#### #007 [25 Pa. Code §§ 127.441 & 127.444]

# Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:







# **SECTION B. General State Only Requirements**

- (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 for the source is 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 State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

### #008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

It shall not be a defense for the permittee in an enforcement action that it was necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

# #009 [25 Pa. Code §§ 127.442(a) & 127.461]

**Duty to Provide Information.** 

- (a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.
- (b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

# #010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

This operating permit may be terminated, modified, suspended or revoked and reissued if one or more of the following applies:

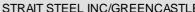
- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

# #011 [25 Pa. Code §§ 127.450, 127.462, 127.465 & 127.703]

# **Operating Permit Modifications**

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and significant operating permit modifications, under this permit, as outlined below:

28-05050





# **SECTION B.** General State Only Requirements

- (b) Administrative Amendments. The permittee shall submit the application for administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall submit the application for minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Significant Operating Permit Modifications. The permittee shall submit the application for significant operating permit modifications in accordance with 25 Pa. Code § 127.465.
- (e) 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.

#### #012 [25 Pa. Code § 127.441]

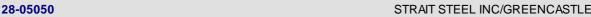
Severability Clause.

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

#### #013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. 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.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder 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, the regulations thereunder or 25 Pa. Code Article III.
  - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:



# **SECTION B.** General State Only Requirements

- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
  - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility 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.
- (e) 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 (c)(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 this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (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, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making 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.

#### #014 [25 Pa. Code § 127.3]

### Operational Flexibility.

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

- (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)







# **SECTION B.** General State Only Requirements

- (6) Section 127.462 (relating to minor operating permit modifications)
- (7) Subchapter H (relating to general plan approvals and general operating permits)

### #015 [25 Pa. Code § 127.11]

### Reactivation

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (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).

### #016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

- (a) When needed to protect public health, welfare and the environment from emissions of hazardous air pollutants from new and existing sources, the permittee shall comply with the health risk-based emission standards or operating practice requirements imposed by the Department, except as precluded by §§ 6.6(d)(2) and (3) of the Air Pollution Control Act [35 P.S. § 4006.6(d)(2) and (3)].
- (b) A person challenging a performance or emission standard established by the Department has the burden to demonstrate that performance or emission standard does not meet the requirements of Section 112 of the Clean Air Act.

# #017 [25 Pa. Code § 121.9]

# Circumvention.

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 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

### #018 [25 Pa. Code §§ 127.402(d) & 127.442]

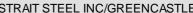
# Reporting Requirements.

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) 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 in the permit transmittal letter, or otherwise notified)

- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such

28-05050





# **SECTION B.** General State Only Requirements

records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

#### #019 [25 Pa. Code §§ 127.441(c) & 135.5]

### Sampling, Testing and Monitoring Procedures.

- (a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.
- (b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

#### #020 [25 Pa. Code §§ 127.441(c) and 135.5]

### Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
  - (1) The date, place (as defined in the permit) and time of sampling or measurements.
  - (2) The dates the analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of the analyses.
  - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any 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.

#### #021 [25 Pa. Code § 127.441(a)]

**Property Rights.** 

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

#022 [25 Pa. Code § 127.447]

**Alternative Operating Scenarios.** 

The permittee is authorized to make changes at the facility to implement alternative operating scenarios identified in this permit in accordance with 25 Pa. Code § 127.447.







# **SECTION B. General State Only Requirements**

# #023 [25 Pa. Code §135.3]

# Reporting

- (a) If the facility is a Synthetic Minor Facility, 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 of a Synthetic Minor Facility 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.

# #024 [25 Pa. Code §135.4]

### **Report Format**

If applicable, the 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).**

28-05050

# # 001 [25 Pa. Code §123.1]

### Prohibition of certain fugitive emissions

The permittee shall not permit the emission into the outdoor atmosphere of a fugitive air contaminant from a source other than the following:

- (a) Construction or demolition of buildings or structures.
- (b) Grading, paving, and maintenance of roads and streets.
- (c) 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.
- (d) Clearing of land.
- (e) Stockpiling of materials.
- (f) Open burning of clearing and grubbing wastes (trees, shrubs and other native vegetation which are cleared from land during or prior to the process of construction; does not include demolition wastes and dirt-laden roots).
- (g) Sources and classes of sources other than those identified in parts (a)-(f), above, for which the permittee has obtained a determination from the Department, in accordance with 25 Pa. Code §123.1(b), that fugitive emissions from the source, after appropriate control, meet the following requirements:
- (1) The emissions are of minor significance with respect to causing air pollution; and
- (2) The emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

### # 002 [25 Pa. Code §123.2]

### **Fugitive particulate matter**

The permittee shall not allow the emission of fugitive particulate matter into the outdoor atmosphere from a source specified in Section C, Condition #001(a)-(g), if the emissions are visible at the point the emissions pass outside the permittee's property.

### # 003 [25 Pa. Code §123.31]

### Limitations

The permittee shall not allow 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 permittee's property.

### # 004 [25 Pa. Code §123.41]

### Limitations

The permittee shall not allow 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:

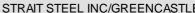
- (a) Equal to or greater than 20% for a period or periods aggregating more than three minutes in any one hour.
- (b) Equal to or greater than 60% at any time.

# # 005 [25 Pa. Code §123.42]

### **Exceptions**

The emission limitations of Section C, Condition #004, shall not apply when:

- (a) The presence of uncombined water is the only reason for failure of the emission to meet the limitations.
- (b) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions.
- (c) The emission results from sources specified in Section C, Condition #001(a)-(g).





#### SECTION C. **Site Level Requirements**

#### # 006 [25 Pa. Code §129.14]

### Open burning operations

28-05050

- (a) The permittee shall not allow the open burning of material on the permittee's property in a manner such that:
- (1) The emissions are visible, at any time, at the point such emissions pass outside the permittee's property.
- (2) Malodorous air contaminants from the open burning are detectable outside the permittee's property.
- (3) The emissions interfere with the reasonable enjoyment of life or property.
- (4) The emissions cause damage to vegetation or property.
- (5) The emissions are or may be deleterious to human or animal health.
- (b) The requirements of (a), above, do not apply when the open burning operations result from:
- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
- (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) A fire set solely for recreational or ceremonial purposes.
- (5) A fire set solely for cooking food.
- (c) This permit condition does not constitute authorization to burn solid waste pursuant to §610(3) of the Solid Waste Management Act (SWMA), contained at 35 P.S. §6018.610(3), or any other provision of the SWMA.

#### II. TESTING REQUIREMENTS.

#### # 007 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

The Department reserves the right to require exhaust stack testing of the sources referenced in this operating permit to measure emissions for purposes including verification of plan approval condition compliance and estimation of annual air emissions.

#### # 008 [25 Pa. Code §139.1]

# Sampling facilities.

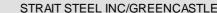
Upon the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance by the Department of tests on such sources. In the request, the Department will set forth the time period in which the facilities shall be provided as well as the specifications for such facilities.

#### # 009 [25 Pa. Code §139.11]

# General requirements.

- (a) As specified in 25 Pa. Code §139.11(1), performance tests shall be conducted while the source is operating at maximum routine operating conditions or under such other conditions, within the capacity of the equipment, as may be requested by the Department.
- (b) As specified in 25 Pa. Code §139.11(2), the Department will consider test results for approval where sufficient information is provided to verify the source conditions existing at the time of the test and where adequate data is available to show the manner in which the test was conducted. Information submitted to the Department shall include, at a minimum, all of the following:
- (1) A thorough source description, including a description of any air cleaning devices and the flue.







28-05050

- (2) Process conditions, for example, the paint usage rate, and other conditions which may affect emissions from the process.
- (3) The location of the sampling ports.
- (4) Effluent characteristics, including velocity, temperature, moisture content, gas density (percentage CO, CO2, O2, and N2), static and barometric pressures.
- (5) Sample collection techniques employed, including procedures used, equipment descriptions, and data to verify that isokinetic sampling for particulate matter collection occurred and that acceptable test conditions were met.
- (6) Laboratory procedures and results.
- (7) Calculated results.

#### Ш MONITORING REQUIREMENTS.

#### # 010 [25 Pa. Code §123.43]

### Measuring techniques

The permittee shall measure visible emissions (referenced in Section C, Conditions #004, #005, and #011) using either of the following:

- (a) A device approved by the Department and maintained to provide accurate opacity measurements (e.g., Continuous Opacity Monitor).
- (b) Observers trained and certified in EPA Reference Method 9 to measure plume opacity with the naked eye; or with the aid of any device(s) approved by the Department.

# [25 Pa. Code §127.441]

# Operating permit terms and conditions.

The permittee shall conduct a monthly inspection around the plant periphery during daylight hours when the plant is in production to detect visible emissions, fugitive particulate matter emissions, and malodorous air contaminants. Monthly inspections are necessary to determine:

- (a) The presence of visible emissions as stated in Section C, Condition #004. Visible emissions may be measured according to the methods specified in Section C, Condition #010. Alternately, plant personnel who observe visible emissions may report the incidence of visible emissions to the Department within two (2) hours of the incident and make arrangements for a certified observer to measure the visible emissions.
- (b) The presence of fugitive particulate matter emissions beyond the plant property boundaries, as stated in Section C, Condition #002.
- (c) The presence of malodorous air contaminants beyond the plant property boundaries, as stated in Section C, Condition #003.

### IV. RECORDKEEPING REQUIREMENTS.

#### # 012 [25 Pa. Code §127.441]

# Operating permit terms and conditions.

- (a) The permittee shall calculate the monthly air emissions from the facility using material balance, AP-42 emission factors, manufacturer-supplied emission factors, performance (stack) test data, CEMS data, or other method(s) acceptable to the Department. The permittee shall maintain records of the facility's monthly air emissions and calculations.
- (b) The permittee shall retain these records for a minimum of five (5) years. The records shall be made available to the Department upon its request.



# **SECTION C.** Site Level Requirements

28-05050

# # 013 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

- (a) The permittee shall maintain records of the monthly inspections referenced in Section C, Condition #011. The records shall include, at a minimum, the following information:
- (1) The name of the company representative monitoring each inspection.
- (2) The date and time of each inspection.
- (3) The wind direction during each inspection.
- (4) A description of the visible emissions, fugitive particulate matter emissions (beyond the plant property boundaries), and malodorous air contaminants (beyond the plant property boundaries) observed, if any, and actions taken to mitigate them. If no visible emissions or fugitive particulate matter emissions or malodors are observed, then document that none were observed.
- (b) The permittee shall retain these records for a minimum of five (5) years. The records shall be made available to the Department upon its request.

### V. REPORTING REQUIREMENTS.

### # 014 [25 Pa. Code §127.442]

### Reporting requirements.

The permittee shall report malfunctions which occur at the facility to the Department. 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 that may result in an increase in air emissions above minor significance. Failures that are caused in part by poor maintenance or careless operation are not malfunctions. Malfunctions shall be reported as follows:

- (a) Malfunctions which pose an imminent danger to public health, safety, welfare and the environment, shall be immediately reported to the Department by telephone. The telephone report of such malfunctions shall occur no later than two hours after discovery of the incident. Telephone reports can be made to the Air Quality Program at (814) 946-7294 during normal business hours, or to the Department's Emergency Hotline 866-825-0208 at any time. The Emergency Hotline phone number is changed/updated periodically. The current Emergency Hotline phone number can be found at https://www.dep.pa.gov/About/Regional/SouthcentralRegion/Pages/default.aspx.
  - (1) The notice shall describe the:
    - (i) name and location of the facility;
    - (ii) nature and cause of the malfunction or breakdown;
    - (iii) time when the malfunction or breakdown was first observed;
    - (iv) expected duration of excess emissions; and
    - (v) estimated rate of emissions.
  - (2) The owner or operator shall notify the Department immediately when corrective measures have been accomplished.
- (3) The permittee shall submit a written report of instances of such malfunctions to the department, in writing, within three (3) days of the of the telephone report.
- (4) The owner or operator shall submit reports on the operation and maintenance of the source to the Regional Air Program Manager at such intervals and in such form and detail as may be required by the Department. Information required in the reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and maintenance schedules.
- (b) Unless otherwise required by this permit, any other malfunction that is not subject to the reporting requirements of (a) above, shall be reported to the Department, in writing, within five (5) days of discovery of the malfunction.







#### **Site Level Requirements** SECTION C.

(c) Malfunctions shall be reported electronically to DEP at the following email address: jpiptaiii@pa.gov

#### # 015 [25 Pa. Code §135.3]

# Reporting

- (a) Unless otherwise approved in writing by DEP, a copy of the annual air emissions report for a given calendar year is due no later than March 1 of the following year, and shall be submitted electronically to the Air Quality District Supervisor, at the following email address, unless otherwise specified: jpiptaiii@pa.gov
- (b) The monthly air emissions and calculations referenced in Section C. Condition #012, shall be included in the annual air emissions report.
- (c) The permittee may request an extension of time from the Department for the filing of the air emissions report specified in part (a), above, and the Department may grant the extension for reasonable cause.

#### WORK PRACTICE REQUIREMENTS. VI.

### [25 Pa. Code §123.1]

# Prohibition of certain fugitive emissions

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

- (a) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (b) Application of asphalt, oil, water, or suitable chemicals 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.

#### [25 Pa. Code §127.444] # 017

### Compliance requirements.

The permittee shall operate and maintain all sources and any air cleaning devices identified in this operating permit in accordance with the manufacturer's recommendations/specifications, as well as in a manner consistent with good operating and air pollution control practices that minimize air emissions.

# ADDITIONAL REQUIREMENTS.

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

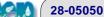
### VIII. COMPLIANCE CERTIFICATION.

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

# COMPLIANCE SCHEDULE.

No compliance milestones exist.





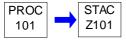


# SECTION D. Source Level Requirements

Source ID: 101 Source Name: SURFACE COATING OPERATION

Source Capacity/Throughput: 10.000 Lbs/HR VOC

Conditions for this source occur in the following groups: 002



# I. RESTRICTIONS.

# **Emission Restriction(s).**

# 001 [25 Pa. Code §127.1]

Purpose.

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

Pursuant to the Best Available Technology (BAT) provisions of 25 Pa. Code §127.1, the permittee shall limit Source ID 101's annual emissions to less than or equal to the following thresholds during any consecutive 12-month period:

- (a) 20.5 tons per year (TPY) of VOC (including cleanup solvent usage).
- (b) 9.4 TPY of aggregate hazardous air pollutants (HAPs).
- (c) 17.1 TPY of particulate matter (PM).
- (d) 17.1 TPY of PM-10 (particulate matter having an effective aerodynamic diameter less than or equal to a nominal 10 micron body).
- (e) 17.1 TPY of PM-2.5 (particulate matter having an effective aerodynamic diameter less than or equal to a nominal 2.5 micron body).

# Operation Hours Restriction(s).

# 002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

Source ID 101 shall not operate (i.e., spray paint) more than 4,160 hours during any consecutive 12-month period.

### II. TESTING REQUIREMENTS.

# 003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

The permittee shall demonstrate the VOC/HAP content of each surface coating by one of the following methods:

- (a) For surface coatings applied as they are received from the manufacturer, the permittee may demonstrate compliance with the applicable standard by obtaining EPA Method 24 certification testing from the manufacturer, or by maintaining VOC/HAP data sheets from the manufacturer.
- (b) In the absence of EPA Method 24 certification testing from the manufacturer, or VOC/HAP data sheets from the manufacturer, allowed under part (a), above, the permittee shall perform EPA Method 24 certification testing on all surface





# U STRAIT STEEL INC/GREENCAST



# **SECTION D.** Source Level Requirements

coatings applied as received from the manufacturer.

(c) The permittee may use calculated VOC content values in lieu of EPA Method 24 certification testing for multi-part surface coatings where the permittee maintains VOC/HAP data sheets for all surface coating constituents (i.e., coatings, pigments, thinners/cutting solvents), and also maintains documentation from the manufacturer as to the recommended mix ratio of the parts. In the event of any inconsistency between the calculated VOC content and data obtained from EPA Method 24 certification testing, the latter shall take precedence.

# III. MONITORING REQUIREMENTS.

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

# IV. RECORDKEEPING REQUIREMENTS.

# # 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

- (a) The permittee shall calculate the monthly air emissions from Source ID 101 using material balance, AP-42 emission factors, manufacturer-supplied emission factors, or other method(s) acceptable to the Department. The permittee shall maintain records of Source ID 101's monthly air emissions and calculations.
- (b) The permittee shall calculate the cumulative Source ID 101 air emissions for each consecutive 12-month period. The permittee shall maintain records of the cumulative Source ID 101 air emissions for each consecutive 12-month period in order to demonstrate compliance with Condition #001, above.
- (c) The permittee shall retain these records for a minimum of five (5) years. The records shall be made available to the Department upon its request.

# # 005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

The permittee shall maintain records of all EPA Method 24 certification testing performed (or VOC/HAP data sheets from the manufacturer (e.g., MSDSs, CPDSs, PDSs or EDSs)), as well as any solids content testing performed, in accordance with Condition #001, above, for the most recent five (5) year period. The records shall be made available to the Department upon its request.

# # 006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

The permittee shall maintain daily records of:

- (a) The following parameters for each coating, thinner and other component(s) as supplied:
- (1) The coating, thinner or component(s) name and identification number
- (2) The volume used
- (3) The mix ratio for the as applied surface coating
- (4) The density or specific gravity
- (5) The weight percent of total volatiles, water, solids and exempt VOCs
- (6) The volume percent of solids
- (b) The VOC content of each coating, thinner and other component(s) as supplied.

28-05050



# **SECTION D.** Source Level Requirements

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

The permittee shall maintain these records for a minimum of five (5) years. The records shall be made available to the Department upon request.

[Compliance with the requirement(s) specified in this streamlined plan approval condition assures compliance with the VOC emission limit specified in 25 Pa. Code §129.52(c)]

# 007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

- (a) The permittee shall maintain records of Source ID 101's monthly hours of operation (i.e., spray painting).
- (b) The permittee shall maintain records of Source ID 101's cumulative hours of operation (i.e., spray painting) for each consecutive 12-month period. This is necessary to demonstrate compliance with Condition #002, above.
- (c) The permittee shall retain these records for a minimum of five (5) years. The records shall be made available to the Department upon its request.

### V. REPORTING REQUIREMENTS.

# # 008 [25 Pa. Code §135.3]

### Reporting

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

- (a) The permittee shall include the following information for each coating, thinner and other component(s) applied at Source ID 101 in the annual air emissions report referenced in Section C, Condition #015(a):
  - (1) Name and identification number
- (2) The VOC content of the coating, thinner and other component(s) as supplied (pounds VOC per gallon of coating solids, minus water and exempt VOCs)
- (3) The VOC content of the as applied surface coating (pounds VOC per gallon of coating solids, minus water and exempt VOCs)
  - (4) Coating density (pounds per gallon, at 25°C)
  - (5) Percent total volatiles (by weight)
  - (6) Percent water (by weight)
  - (7) Percent solids (by volume and weight)
  - (8) Percent exempt VOC(s) (by weight)
  - (9) Percent VOCs (by weight)
- (10) Mix ratio for the as applied surface coating
- (11) Percent hazardous air pollutant(s) [HAP(s)] (by weight and by type)
- (12) Gallons per month used
- (13) Pounds per month of VOC emissions
- (14) Pounds per month of HAP(s) emissions (by type)
- (15) Tons total per each month's consecutive 12-month period of VOC emissions
- (16) Tons total per each month's consecutive 12-month period of HAP(s) emissions (by type)

The permittee shall also include the type and amount (gallons per month) of VOC/HAP-containing cleanup solvent(s) collectively used in conjunction with the operation of Source ID 101 (i.e. cleaning activities and wash-off operations), as well as the resultant monthly VOC and HAP(s) emissions.

This information shall be reported using VOC Worksheets supplied by the Department, or an equivalent format acceptable to the Department.





# **SECTION D.** Source Level Requirements

- (b) The hours of operation of Source ID 101 shall also be included in the annual report.
- (c) The permittee shall provide the following information for waste coatings, solvents, or mixtures sent off-site for recycling or disposal in order to obtain credit for VOC and HAP(s) emissions reporting for (a)(13)&(15) and (a)(14)&(16), respectively, above:
- (1) Pounds or gallons per month of waste coatings, solvents, or mixtures shipped from the facility
- (2) Waste profile or sampling data for a representative shipment (conducted a minimum of once each calendar year)
- (3) Identification of the waste disposal company for each shipment
- (d) The permittee shall include each new surface coating in the annual report and indicate that it is a new surface coating used during the reporting year.

### VI. WORK PRACTICE REQUIREMENTS.

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

# VII. ADDITIONAL REQUIREMENTS.

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



SECTION D.

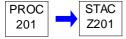


# **Source Level Requirements**

Source ID: 201 Source Name: WELDING OPERATIONS

Source Capacity/Throughput: N/A

Conditions for this source occur in the following groups: 001



### I. RESTRICTIONS.

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

### II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

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

### IV. RECORDKEEPING REQUIREMENTS.

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

### V. REPORTING REQUIREMENTS.

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

# VI. WORK PRACTICE REQUIREMENTS.

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

### VII. ADDITIONAL REQUIREMENTS.

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



28-05050



# SECTION E. Source Group Restrictions.

Group Name: 001

Group Description: SOURCE SUBJECT TO MACT SUBPART XXXXXX

Sources included in this group

ID Name
201 WELDING OPERATIONS

### I. RESTRICTIONS.

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

### II. TESTING REQUIREMENTS.

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

# III. MONITORING REQUIREMENTS.

# # 001 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11517]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

What are my monitoring requirements?

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

- (a) Visual determination of fugitive emissions, general. Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22 of 40 CFR Part 60, Appendix A-7. You must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the 15-minute period.
- (b) Visual determination of fugitive emissions, graduated schedule. Visual determinations of fugitive emissions must be performed in accordance with 40 CFR §63.11517(a), above, and according to the schedule in 40 CFR §63.11517(b)(1) through (4), below.
- (1) Daily Method 22 Testing. Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.
- (2) Weekly Method 22 Testing. If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests performed in accordance with 40 CFR §63.11517(b)(1), above, for 10 days of work day operation of the process, you may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, you must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation in accordance with 40 CFR §63.11517(b)(1), above.
- (3) Monthly Method 22 Testing. If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with 40 CFR §63.11517(b)(2), above, you may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, you must resume weekly EPA Method 22 testing in accordance with 40 CFR §63.11517(b)(2), above.
- (4) Quarterly Method 22 Testing. If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with 40 CFR §63.11517(b)(3), above, you may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, you must resume monthly EPA Method 22 testing in accordance with 40 CFR §63.11517(b)(3), above.
- (c) Visual determination of emissions opacity for welding Tier 2 or 3, general. Visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9 of 40 CFR Part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be 30 minutes.
- (d) Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule. You must perform visual



determination of emissions opacity in accordance with 40 CFR §63.11517(c), above, and according to the schedule in 40 CFR §63.11517(d)(1) through (5), below.

- (1) Daily Method 9 testing for welding, Tier 2 or 3. Perform visual determination of emissions opacity once per day during each day that the process is in operation.
- (2) Weekly Method 9 testing for welding, Tier 2 or 3. If the average of the six-minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with 40 CFR §63.11517(d)(1), above, does not exceed 20 percent for 10 days of operation of the process, you may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, you must resume testing every day of operation of the process according to the requirements of 40 CFR §63.11517(d)(1), above.
- (3) Monthly Method 9 testing for welding Tier 2 or 3. If the average of the six-minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with 40 CFR §63.11517(d)(2), above, does not exceed 20 percent for four consecutive weekly tests, you may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, you must resume testing every five days of operation of the process according to the requirements of 40 CFR §63.11517(d)(2), above.
- (4) Quarterly Method 9 testing for welding Tier 2 or 3. If the average of the six-minute opacities recorded during any of the consecutive monthly EPA Method 9 tests performed in accordance with 40 CFR §63.11517(d)(3), above, does not exceed 20 percent for three consecutive monthly tests, you may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, you must resume testing every 21 days (month) of operation of the process according to the requirements of 40 CFR §63.11517(d)(3), above.
- (5) Return to Method 22 testing for welding, Tier 2 or 3. If, after two consecutive months of testing, the average of the sixminute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with 40 CFR §63.11517(d)(3), above, does not exceed 20 percent, you may resume EPA Method 22 testing as in 40 CFR §63.11517(b)(3) and (4), above. In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with 40 CFR §63.11517(d)(3)and (4), above.

# IV. RECORDKEEPING REQUIREMENTS.

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

### V. REPORTING REQUIREMENTS.

#### # 002 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11519]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal **Fabrication and Finishing Source Categories** 

What are my notification, recordkeeping, and reporting requirements?

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

- (a) What notifications must I submit?
- (1) Initial notification. If you are the owner or operator of an area source in one of the nine metal fabrication and finishing source categories as defined in 40 CFR §63.11514, "Am I subject to this subpart?," you must submit the Initial Notification required by 40 CFR §63.9(b), "General Provisions," for a new affected source no later than 120 days after initial startup or November 20, 2008, whichever is later. For an existing affected source, you must submit the Initial Notification no later than July 25, 2011.

ITHE PERMITTEE SUBMITTED THE INITIAL NOTIFICATION TO U.S. EPA (RECEIVED ON MAY 27, 2015) AND THE DEPARTMENT (RECEIVED ON MAY 26, 2015)]

(2) Notification of compliance status. If you are the owner or operator of an existing affected source, you must submit a notification of compliance status on or before November 22, 2011. If you are the owner or operator of a new affected source,



you must submit a notification of compliance status within 120 days after initial startup, or by November 20, 2008, whichever is later.

[THE PERMITTEE SUBMITTED THE NOTIFICATION OF COMPLIANCE STATUS TO U.S. EPA (RECEIVED ON MAY 27, 2015) AND THE DEPARTMENT (RECEIVED ON MAY 26, 2015)]

- (b) What reports must I prepare or submit?
- (1) Annual certification and compliance reports. You must prepare and submit annual certification and compliance reports for each affected source according to the requirements of 40 CFR §63.11519(b)(2) through (7), below. The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA) as specified in 40 CFR §63.11519(b)(3), below.
- (2) Dates. Unless the Administrator has approved or agreed to a different schedule for submission of reports under 40 CFR §63.10(a), "General Provisions," you must prepare and submit each annual certification and compliance report according to the dates specified in 40 CFR §63.11519(b)(2)(i) through (iii), below. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (i) The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.
- (ii) Each subsequent annual certification and compliance report must cover the subsequent annual reporting period from January 1 through December 31.
- (iii) Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily accessible location for inspector review. If an exceedence has occurred during the year, each annual certification and compliance report must be submitted along with the exceedence reports and postmarked or delivered no later than January 31.
- (3) [N/A THE FACILITY IS NOT SUBJECT TO TITLE V PERMITTING REGULATIONS]
- (4) General requirements. The annual certification and compliance report must contain the information specified in 40 CFR §63.11519(b)(4)(i) through (iii), below, and the information specified in 40 CFR §63.11519(b)(5) through (7), below, that is applicable to each affected source.
  - (i) Company name and address;
- (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
- (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (5) Visual determination of fugitive emissions requirements. The annual certification and compliance report must contain the information specified in 40 CFR §63.11519(b)(5)(i) through (iii), below, for each affected source which performs visual determination of fugitive emissions in accordance with 40 CFR §63.11517(a), "Monitoring requirements."
  - (i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
  - (ii) A description of the corrective actions taken subsequent to the test; and
  - (iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.
- (6) Visual determination of emissions opacity requirements. The annual certification and compliance report must contain the information specified in 40 CFR §63.11519(b)(6)(i) through (iii), below, for each affected source which performs visual







determination of emissions opacity in accordance with 40 CFR §63.11517(c), "Monitoring requirements."

- (i) The date of every visual determination of emissions opacity;
- (ii) The average of the six-minute opacities measured by the test; and
- (iii) A description of any corrective action taken subsequent to the test.
- (7) [Reserved]
- (8) Exceedences of 20 percent opacity for welding affected sources. As required by 40 CFR §63.11516(f)(7)(i), "Requirements for opacities exceeding 20 percent," you must prepare an exceedence report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with your annual certification and compliance report according to the requirements in 40 CFR §63.11519(b)(1), above, and must contain the information in 40 CFR §63.11519(b)(8)(A) and (B), below.
  - (A) The date on which the exceedence occurred; and
  - (B) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.
- (9) Site-Specific Welding Emissions Management Plan reporting. You must submit a copy of the records of daily visual determinations of emissions recorded in accordance with 40 CFR §63.11516(f)(7)(iv), "Tier 3 requirements for opacities exceeding 20 percent," and a copy of your Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to 40 CFR §63.11516(f)(8), "Site-Specific Welding Emission Management Plan," along with your annual certification and compliance report, according to the requirements in 40 CFR §63.11519(b)(1), above.
- (c) What records must I keep? You must collect and keep records of the data and information specified in 40 CFR §63.11519(c)(1) through (14), below, according to the requirements in 40 CFR §63.11519(c)(15), below.
- (1) General compliance and applicability records. Maintain information specified in 40 CFR §63.11519(c)(1)(i) through (ii), below, for each affected source.
- (i) Each notification and report that you submitted to comply with 40 CFR Part 63, Subpart XXXXXX, and the documentation supporting each notification and report.
- (ii) Records of the applicability determinations as in 40 CFR §63.11514(b)(1) through (5), "Am I subject to this subpart," listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.
- (2) Visual determination of fugitive emissions records. Maintain a record of the information specified in 40 CFR §63.11519(c)(2)(i) through (iii), below, for each affected source which performs visual determination of fugitive emissions in accordance with 40 CFR §63.11517(a), "Monitoring requirements."
  - (i) The date and results of every visual determination of fugitive emissions;
  - (ii) A description of any corrective action taken subsequent to the test; and
  - (iii) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
- (3) Visual determination of emissions opacity records. Maintain a record of the information specified in 40 CFR §63.11519(c)(3)(i) through (iii), below, for each affected source which performs visual determination of emissions opacity in accordance with 40 CFR §63.11517(c), "Monitoring requirements."
  - (i) The date of every visual determination of emissions opacity; and
  - (ii) The average of the six-minute opacities measured by the test; and







- (iii) A description of any corrective action taken subsequent to the test.
- (4) [N/A CONTROL DEVICES ARE NOT USED TO COMPLY WITH 40 CFR §63.11516]
- (5) [N/A THE FACILITY DOES HAVE A SPRAY PAINTING SOURCE (SOURCE ID 101); HOWEVER, IT DOES NOT CURRENTLY USE ANY PAINT(S) WHICH CONTAIN MFHAP]
- (6) [N/A THE FACILITY DOES HAVE A SPRAY PAINTING SOURCE (SOURCE ID 101); HOWEVER, IT DOES NOT CURRENTLY USE ANY PAINT(S) WHICH CONTAIN MFHAP]
- (7) [N/A THE FACILITY DOES HAVE A SPRAY PAINTING SOURCE (SOURCE ID 101); HOWEVER, IT DOES NOT CURRENTLY USE ANY PAINT(S) WHICH CONTAIN MFHAP]
- (8) [N/A THE FACILITY DOES HAVE A SPRAY PAINTING SOURCE (SOURCE ID 101); HOWEVER, IT DOES NOT CURRENTLY USE ANY PAINT(S) WHICH CONTAIN MFHAP]
- (9)-(10) [Reserved]
- (11) Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan. You must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan in accordance with 40 CFR §63.11516(f)(7)(iii), "Requirements for opacities exceeding 20 percent."
- (12) Site-Specific Welding Emissions Management Plan. If you have been required to prepare a plan in accordance with 40 CFR §63.11516(f)(7)(iii), "Site-Specific Welding Emissions Management Plan," you must maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records and it must be readily available for inspector review.
- (13) Manufacturer's instructions. If you comply with 40 CFR Part 63, Subpart XXXXXX, by operating any equipment according to manufacturer's instructions, you must keep these instructions readily available for inspector review.
- (14) Welding Rod usage. If you operate a new or existing welding affected source which is not required to comply with the requirements of 40 CFR §63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), you must maintain records demonstrating your welding rod usage on a rolling 12-month basis.
- (15) Your records must be maintained according to the requirements in 40 CFR §63.11519(c)(15)(i) through (iii), below.
- (i) Your records must be in a form suitable and readily available for expeditious review according to 40 CFR §63.10(b)(1), "General Provisions." Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- (ii) As specified in 40 CFR §63.10(b)(1), "General Provisions," you must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
- (iii) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to 40 CFR §63.10(b)(1), "General Provisions." You may keep the records off-site for the remaining 3 years.

# VI. WORK PRACTICE REQUIREMENTS.

# # 003 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11516]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

What are my standards and management practices?

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

- (a) [N/A THE FACILITY DOES NOT HAVE ANY DRY ABRASIVE BLASTING SOURCES AS DEFINED IN 40 CFR §63.11522]
- (b) [N/A THE FACILITY DOES NOT HAVE ANY MACHINING SOURCES AS DEFINED IN 40 CFR §63.11522]



- (c) [N/A THE FACILITY DOES NOT HAVE ANY DRY GRINDING OR DRY POLISHING WITH MACHINES SOURCES AS DEFINED IN 40 CFR §63.11522]
- (d) [N/A THE FACILITY DOES HAVE A SPRAY PAINTING SOURCE (SOURCE ID 101); HOWEVER, IT DOES NOT CURRENTLY USE ANY PAINT(S) WHICH CONTAIN MFHAP]
- (e) [Reserved]
- (f) Standards for welding. If you own or operate a new or existing welding affected source, you must comply with the requirements in 40 CFR §63.11516(f)(1) and (2), below, for each welding operation that uses materials that contain MFHAP as defined in 40 CFR §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. If your welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), you must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in 40 CFR §63.11516(f)(3) through (8), below. The requirements in 40 CFR §63.11516(f)(1) through (8), below, do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.
- (1) You must operate all equipment, capture and control devices associated with welding operations according to manufacturer's instructions. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices as specified by the requirements in 40 CFR §63.11519(c)(4), "Notification, recordkeeping, and reporting requirements."
- (2) You must implement one or more of the management practices specified in 40 CFR §63.11516(f)(2)(i) through (v), below, to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.
- (i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW); also called metal inert gas welding (MIG));
  - (ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
- (iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
- (iv) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
  - (v) Use a welding fume capture and control system operated according to the manufacturer's specifications.
- (3) Tier 1 compliance requirements for welding. You must perform visual determinations of welding fugitive emissions as specified in 40 CFR §63.11517(b), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations. You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in 40 CFR §63.11519(c)(2), "Notification, recordkeeping, and reporting requirements."
- (4) Requirements upon initial detection of visible emissions from welding. If visible fugitive emissions are detected during any visual determination required in 40 CFR §63.11516(f)(3), above, you must comply with the requirements in 40 CFR §63.11516(f)(4)(i) and (ii), below.
- (i) Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with 40 CFR §63.11516(f)(2), above. After completing such corrective actions, you must perform a follow-up inspection for visible fugitive emissions in accordance with 40 CFR §63.11517(a), "Monitoring Requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (ii) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with your annual certification and compliance report as



required by 40 CFR §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

- (5) Tier 2 requirements upon subsequent detection of visible emissions. If visible fugitive emissions are detected more than once during any consecutive 12-month period (notwithstanding the results of any follow-up inspections), you must comply with 40 CFR §63.11516(f)(5)(i) through (iv), below.
- (i) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, you must conduct a visual determination of emissions opacity, as specified in 40 CFR §63.11517(c), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (ii) In lieu of the requirement of 40 CFR §63.11516(f)(3), above, to perform visual determinations of fugitive emissions with EPA Method 22, you must perform visual determinations of emissions opacity in accordance with 40 CFR §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (iii) You must keep a record of each visual determination of emissions opacity performed in accordance with 40 CFR §63.11516(f)(5)(i) or (ii), above, along with any subsequent corrective action taken, in accordance with the requirements in 40 CFR §63.11519(c)(3), "Notification, recordkeeping, and reporting requirements."
- (iv) You must report the results of all visual determinations of emissions opacity performed in accordance with 40 CFR §63.11516(f)(5)(i) or (ii), above, along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by 40 CFR §63.11519(b)(6), "Notification, recordkeeping, and reporting requirements."
- (6) Requirements for opacities less than or equal to 20 percent but greater than zero. For each visual determination of emissions opacity performed in accordance with 40 CFR §63.11516(f)(5), above, for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, you must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with 40 CFR §63.11516(f)(2), above.
- (7) Tier 3 requirements for opacities exceeding 20 percent. For each visual determination of emissions opacity performed in accordance with 40 CFR §63.11516(f)(5), above, for which the average of the six-minute average opacities recorded exceeds 20 percent, you must comply with the requirements in 40 CFR §63.11516(f)(7)(i) through (v), below.
- (i) You must submit a report of exceedence of 20 percent opacity, along with your annual certification and compliance report, as specified in 40 CFR §63.11519(b)(8), "Notification, recordkeeping, and reporting requirements," and according to the requirements of 40 CFR §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."
- (ii) Within 30 days of the opacity exceedence, you must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in 40 CFR §63.11516(f)(8), below. If you have already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph [i.e., 40 CFR §63.11516(f)(7)(ii)], you must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
- (iii) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, you must continue to perform visual determinations of emissions opacity beginning on a daily schedule as specified in 40 CFR §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
- (iv) You must maintain records of daily visual determinations of emissions opacity performed in accordance with 40 CFR §63.11516(f)(7)(iii), above, during preparation of the Site-Specific Welding Emissions Management Plan in accordance with the requirements in 40 CFR §63.11519(b)(9), "Notification, recordkeeping, and reporting requirements."
- (v) You must include these records in your annual certification and compliance report according to the requirements of 40 CFR §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."
- (8) Site-Specific Welding Emissions Management Plan. The Site-Specific Welding Emissions Management Plan must comply with the requirements in 40 CFR §63.11516(f)(8)(i) through (iii), below.



# 28-05050

# STRAIT STEEL INC/GREENCASTLE



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

- (i) The Site-Specific Welding Emissions Management Plan must contain the information in 40 CFR §63.11516(f)(8)(i)(A) through (F), below.
  - (A) Company name and address;
  - (B) A list and description of all welding operations which currently comprise the welding affected source;
- (C) A description of all management practices and/or fume control methods in place at the time of the opacity exceedence:
- (D) A list and description of all management practices and/or fume control methods currently employed for the welding affected source:
- (E) A description of additional management practices and/or fume control methods to be implemented pursuant to 40 CFR §63.11516(f)(7)(ii), above, and the projected date of implementation; and
- (F) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries pursuant to 40 CFR §63.11516(f)(8)(i)(D) and (E), above.
- (ii) The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information as required by 40 CFR §63.11516(f)(8)(i)(A) through (C), above, and submitted with your annual certification and compliance report according to the requirements of 40 CFR §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."
- (iii) You must maintain a copy of the current Site-Specific Welding Emissions Management Plan in your records in a readily accessible location for inspector review in accordance with the requirements in 40 CFR §63.11519(c)(12), "Notification, recordkeeping, and reporting requirements."

# VII. ADDITIONAL REQUIREMENTS.

#### # 004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

In the event that 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (MACT Subpart XXXXXX) is revised, the permittee shall comply with the revised version of MACT Subpart XXXXXX, and shall not be required to comply with any provisions in this plan approval designated as having MACT Subpart XXXXXX as their authority, to the extent that such plan approval provisions would be inconsistent with the applicable provisions of the revised MACT Subpart XXXXXX.

#### # 005 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.1]

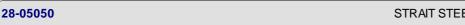
# **Subpart A--General Provisions**

Applicability.

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

The Group 001 source is subject to 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (MACT Subpart XXXXXX). The permittee shall comply with all applicable standards, compliance provisions, performance test, monitoring, record keeping, and reporting requirements contained at 40 CFR §§63.11514 through 63.11523, including all applicable portions of 40 CFR Part 63, Subpart A - General Provisions. The permittee shall comply with 40 CFR §63.13(a), which requires submission of copies of all requests, reports, applications, submittals, and other communications to both the U.S. Environmental Protection Agency (U.S. EPA) and the Department. The U.S. EPA copies shall be forwarded to:

Director Air Protection Division U.S. EPA, Region III (3AP00) 1650 Arch Street Philadelphia, PA 19103-2029





The Department copies shall be forwarded to:

Regional Air Program Manager PA Department of Environmental Protection 909 Elmerton Avenue Harrisburg, PA 17110-8200

# 006 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11514]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Am I subject to this subpart?

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

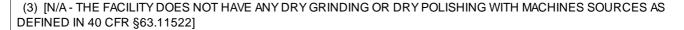
- (a) You are subject to 40 CFR Part 63, Subpart XXXXXXX, if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in 40 CFR §63.11514(a)(1) through (9), below. Descriptions of these source categories are shown in Table 1 of 40 CFR Part 63. "Primarily engaged" is defined in 40 CFR §63.11522, "What definitions apply to this subpart?", as the manufacturing, fabricating, or forging of one or more products listed in one of the nine metal fabrication and finishing source category descriptions in Table 1, "Description of Source Categories Affected by this Subpart," where this production represents at least 50 percent of the production at a facility, and where production quantities are established by the volume, linear foot, square foot, or other value suited to the specific industry. The period used to determine production should be the previous continuous 12 months of operation. Facilities must document and retain their rationale for the determination that their facility is not "primarily engaged" pursuant to 40 CFR §63.10(b)(3) of the General Provisions.
- (1) Electrical and Electronic Equipment Finishing Operations;
- (2) Fabricated Metal Products;
- (3) Fabricated Plate Work (Boiler Shops);
- (4) Fabricated Structural Metal Manufacturing;
- (5) Heating Equipment, except Electric;
- (6) Industrial Machinery and Equipment Finishing Operations;
- (7) Iron and Steel Forging;
- (8) Primary Metal Products Manufacturing; and
- (9) Valves and Pipe Fittings.

[THE PERMITTEE IS PRIMARILY ENGAGED IN CATEGORY NO. 4, ABOVE]

- (b) The provisions of 40 CFR Part 63, Subpart XXXXXX, apply to each new and existing affected source listed and defined in 40 CFR §63.11514(b)(1) through (5), below, if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.
- (1) [N/A THE FACILITY DOES NOT HAVE ANY DRY ABRASIVE BLASTING SOURCES AS DEFINED IN 40 CFR §63.11522]
- (2) [N/A THE FACILITY DOES NOT HAVE ANY MACHINING SOURCES AS DEFINED IN 40 CFR §63.11522]

#### 28-05050 STRAIT STEEL INC/GREENCASTLE

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



- (4) [N/A THE FACILITY DOES HAVE A SPRAY PAINTING SOURCE (SOURCE ID 101); HOWEVER, IT DOES NOT USE ANY PAINT(S) WHICH CONTAIN MFHAP]
- (5) A welding affected source is the collection of all equipment and activities necessary to perform welding operations which use materials that contain MFHAP, as defined in 40 CFR §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.
- (c) An affected source is existing if you commenced construction or reconstruction of the affected source, as defined in 40 CFR §63.2, "General Provisions" to Part 63, before April 3, 2008.
- (d) An affected source is new if you commenced construction or reconstruction of the affected source, as defined in 40 CFR §63.2, "General Provisions" to Part 63, on or after April 3, 2008.
- (e) [N/A THE FACILITY IS NOT A RESEARCH OR LABORATORY FACILITY AS DEFINED IN SECTION 112(c)(7) OF THE CLEAN AIR ACT]
- (f) 40 CFR Part 63. Subpart XXXXXX, does not apply to tool or equipment repair operations, facility maintenance, or quality control activities as defined in 40 CFR §63.11522, "What definitions apply to this subpart?"
- (g) [N/A THE FACILITY IS NOT A OWNED OR OPERATED BY THE U.S. ARMED FORCES (INCLUDING THE COAST GUARD AND THE NATIONAL GUARD OF ANY SUCH STATE), THE NATIONAL AERONAUTICS AND SPACE ADMINISTRATION, OR THE NATIONAL NUCLEAR SECURITY ADMINISTRATION]
- (h) [N/A THE FACILITY DOES NOT PRODUCE MILITARY MUNITIONS MANUFACTURED BY OR FOR THE U.S.ARMED FORCES (INCLUDING THE COAST GUARD AND THE NATIONAL GUARD OF ANY SUCH STATE), OR EQUIPMENT DIRECTLY AND EXCLUSIVELY USED FOR THE PURPOSES OF TRANSPORTING MILITARY MUNITIONS]
- (i) You are exempt from the obligation to obtain a permit under 40 CFR Part 70 or 40 CFR Part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of 40 CFR Part 63, Subpart XXXXXX.

# [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11515]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal **Fabrication and Finishing Source Categories** 

What are my compliance dates?

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

- (a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions in 40 CFR Part 63, Subpart XXXXXX, by July 25, 2011.
- (b) If you own or operate a new affected source, you must achieve compliance with the applicable provisions in 40 CFR Part 63, Subpart XXXXXX, by July 23, 2008, or upon startup of your affected source, whichever is later.

#### # 008 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11522]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal **Fabrication and Finishing Source Categories** 

What definitions apply to this subpart?

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

Terms used in 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, as well as Section E, Group 001, are defined in the Clean Air Act (CAA); in 40 CFR §63.2 (General Provisions); and in 40 CFR §63.11522.

[40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.11523]

Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal







**Fabrication and Finishing Source Categories** What General Provisions apply to this subpart?

[Additional authority for this permit condition is also derived from Plan Approval No. 28-05050A]

The provisions in 40 CFR Part 63, Subpart A (General Provisions), applicable to sources subject to 40 CFR §63.11514(a) are specified in Table 2 of 40 CFR Part 63, Subpart XXXXXX.







Group Name: 002

Group Description: 25 Pa. Code, Section 129.52d Requirements

Sources included in this group

ID	Name
101	SURFACE COATING OPERATION

### RESTRICTIONS.

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

### II. TESTING REQUIREMENTS.

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

### III. MONITORING REQUIREMENTS.

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

### IV. RECORDKEEPING REQUIREMENTS.

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

### V. REPORTING REQUIREMENTS.

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

### VI. WORK PRACTICE REQUIREMENTS.

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

# VII. ADDITIONAL REQUIREMENTS.

#### # 001 [25 Pa. Code §127.441]

### Operating permit terms and conditions.

§ 129.52d. Control of VOC emissions from miscellaneous metal parts surface coating processes, miscellaneous plastic parts surface coating processes and pleasure craft surface coatings.

- (a) Applicability.
- (1) This section applies to the owner and operator of a miscellaneous metal part surface coating process or miscellaneous plastic part surface coating process, or both, if the total actual VOC emissions from all miscellaneous metal part coating units and miscellaneous plastic part coating units, including related cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls.
- (2) This section applies, as specified, to the owner and operator of a miscellaneous metal part surface coating process or miscellaneous plastic part surface coating process, or both, if the total actual VOC emissions from all miscellaneous metal part coating units and miscellaneous plastic part coating units, including related cleaning activities, at the facility are below 2.7 tons per 12-month rolling period, before consideration of controls.
- (3) Compliance with the VOC emission limits and other requirements of this section assures compliance with the VOC emission limits and other requirements of § 129.52 (relating to surface coating processes) for the miscellaneous metal parts and products surface coating processes as specified in § 129.52, Table I, Category 10.







- (4) If an owner or operator elects to comply with § 129.52e (relating to control of VOC emissions from automobile and light-duty truck assembly surface coating operations and heavier vehicle coating operations) under § 129.52e(a)(2) or (3), then § 129.52e instead of this section applies to the separate coating line at the facility, or to the coating of a body or body part for a new heavier vehicle at the facility, or both, for which the election is made.
- (5) This section does not apply to an owner or operator in the use or application of the following:
- (i) Aerosol coatings that meet the requirements of 40 CFR Part 59, Subpart E (relating to National volatile organic compound emission standards for aerosol coatings).
- (ii) Aerospace coatings.
- (iii) Architectural coatings.
- (iv) Automobile refinishing coatings.
- (v) Auto and light-duty truck assembly coatings.
- (vi) Can, coil or magnet wire coatings.
- (vii) Coating applied to a test panel or coupon, or both, in research and development, quality control or performance testing activities, if records are maintained as required under subsections (e) and (f).
- (viii) Fiberglass boat manufacturing materials.
- (ix) Flat wood paneling coatings.
- (x) Large appliance coatings.
- (xi) Metal furniture coatings.
- (xii) Miscellaneous industrial adhesives.
- (xiii) Paper, film and foil coatings.
- (xiv) Shipbuilding and repair coatings.
- (xv) Wood furniture coatings.
- (b) Definitions. [INCORPORATED BY REFERENCE]
- (c) Existing RACT permit. The requirements of this section supersede the requirements of a RACT permit issued under §§ 129.91—129.95 (relating to stationary sources of NOx and VOCs) to the owner or operator of a source subject to subsection (a) prior to January 1, 2017, to control, reduce or minimize VOCs from a miscellaneous metal part or miscellaneous plastic part surface coating process, except to the extent the RACT permit contains more stringent requirements.
- (d) Emission limitations. Beginning January 1, 2017, a person subject to subsection (a)(1) may not cause or permit the emission into the outdoor atmosphere of VOCs from a miscellaneous metal part coating unit or miscellaneous plastic part coating unit, or both, unless emissions of VOCs are controlled in accordance with paragraph (1), (2) or (3).
- (1) Compliant materials option. The VOC content of each miscellaneous metal part coating or each miscellaneous plastic part coating, as applied, excluding water and exempt compounds, is equal to or less than the VOC content limit for the applicable coating category specified in the applicable table of VOC content limits in Tables I—V.

Table I. VOC Content Limits for Metal Parts and Products Surface Coatings Weight of VOC per Volume of Coating, Less

28-05050



# SECTION E. Source Group Restrictions.

Water and Exempt Compounds, as Applied.

	Air Dried		Baked	
Coating Category	kg VOC/ I coating	lb VOC/ gal coating	kg VOC/ I coating	lb VOC/ gal coating
General One-component	0.34	2.8	0.28	2.3
General Multicomponent	0.34	2.8	0.28	2.3
Prefabricated Architectural One-component	0.42	3.5	0.28	2.3

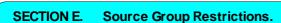
- (2)-(3) [NA NO VOC CONTROL DEVICE]
- (4) Least restrictive VOC limit. If more than one VOC content limit or VOC emission rate limit applies to a specific coating, then the least restrictive VOC content limit or VOC emission rate limit applies.
- (5) Coatings not listed in Table I, II, VI or VII. For a miscellaneous metal part or miscellaneous plastic part coating that does not meet the coating categories listed in Table I, II, VI or VII, the VOC content limit or VOC emission rate limit shall be determined by classifying the coating as a general one component coating or general multicomponent coating. The corresponding general one component coating or general multicomponent coating limit applies.
- (6) Coatings not listed in Table IV or IX. [NA FACILITY DOES NOT USE PLEASURE CRAFT COATINGS]
- (e) Compliance and monitoring requirements.
- (1) All owners and operators. Regardless of the facility's VOC emissions, the owner or operator of a miscellaneous metal part surface coating process or miscellaneous plastic part surface coating process, or both, subject to subsection (a)(1) or (2), shall comply with this section as specified throughout this section. For an owner or operator subject only to subsection (a)(2), the compliance requirements are the recordkeeping requirements in subsection (f)(2).
- (2) [NA NO VOC CONTROL DEVICE]
- (f) Recordkeeping and reporting requirements.
- (1) The owner or operator of a miscellaneous metal part coating unit or miscellaneous plastic part coating unit, or both, subject to subsection (a)(1) shall maintain monthly records sufficient to demonstrate compliance with this section. The records must include the following information:
- (i) The following parameters for each coating, thinner, component and cleaning solvent as supplied:
- (A) Name and identification number of the coating, thinner, other component or cleaning solvent.
- (B) Volume used.
- (C) Mix ratio.
- (D) Density or specific gravity.
- (E) Weight percent of total volatiles, water, solids and exempt solvents.
- (F) Volume percent of total volatiles, water and exempt solvents for the applicable table of limits in Tables I—V.
- (G) Volume percent of solids for the applicable table of limits in Tables VI—IX.
- (ii) The VOC content of each coating, thinner, other component and cleaning solvent as supplied.
- (iii) The VOC content of each as applied coating or cleaning solvent.



28-05050

- (iv) The calculations performed for each applicable requirement under subsections (d) and (e).
- (v) The information required in a plan approval issued under subsection (e)(2).
- (2) An owner or operator subject to subsection (a)(2), or otherwise claiming an exemption or exception in this section, shall maintain records sufficient to verify the applicability of subsection (a)(2), the exemption or exception. Records maintained for compliance demonstrations may include purchase, use, production and other records.
- (3) The records shall be maintained onsite for 2 years, unless a longer period is required by an order, plan approval or operating permit issued under Chapter 127 (relating to construction, modification, reactivation and operation of sources).
- (4) The records shall be submitted to the Department in an acceptable format upon receipt of a written request from the Department.
- (g) Coating application methods. A person subject to subsection (a)(1) may not cause or permit the emission into the outdoor atmosphere of VOCs from a miscellaneous metal part coating unit or miscellaneous plastic part coating unit, or both, unless the coatings are applied using one or more of the following coating application methods:
- (1) Electrostatic coating.
- (2) Flow coating.
- (3) Dip coating, including electrodeposition.
- (4) Roll coating.
- (5) High volume-low pressure (HVLP) spray coating.
- (6) Airless spray coating.
- (7) Air-assisted airless spray coating.
- (8) Other coating application method if approved in writing by the Department prior to use.
- (i) The coating application method must be capable of achieving a transfer efficiency equivalent to or better than that achieved by HVLP spray coating.
- (ii) The owner or operator shall submit the request for approval to the Department in writing.
- (h) Exempt coatings and exempt coating unit operations.
- (1) The requirements of subsections (d) and (g) do not apply to the application of the following coatings to a metal part:
- (i) Stencil coating.
- (ii) Safety-indicating coating.
- (iii) Solid-film lubricant.
- (iv) Electric-insulating and thermal-conducting coating.
- (v) Magnetic data storage disk coating.
- (vi) Plastic extruded onto metal parts to form a coating.
- (vii) Powder coating.





- (2) The requirements of subsection (d) do not apply to the application of the following coatings to a plastic part:
- (i) Touch-up and repair coating.

28-05050

- (ii) Stencil coating applied on a clear or transparent substrate.
- (iii) Clear or translucent coating.
- (iv) Coating applied at a paint manufacturing facility while conducting performance tests on coating.
- (v) Reflective coating applied to highway cones.
- (vi) Mask coating, if the coating is less than 0.5 millimeter thick (dried) and the area coated is less than 25 square inches.
- (vii) EMI/RFI shielding coating.
- (viii) Heparin-benzalkonium chloride (HBAC)-con-taining coating applied to a medical device, provided that the total usage of HBAC-containing coatings does not exceed 100 gallons in 1 calendar year at the facility.
- (ix) Powder coating.
- (x) An individual coating category used in an amount less than 50 gallons in 1 calendar year provided that the total usage of all of the coatings, combined, does not exceed 200 gallons per year at the facility. This exception applies only if substitute compliant coatings are not available.
- (3) The requirements of subsection (d) do not apply to the application of the following coatings to automotive-transportation and business machine parts:
- (i) Texture coat.
- (ii) Vacuum-metalizing coating.
- (iii) Gloss reducer.
- (iv) Texture topcoat.
- (v) Adhesion primer.
- (vi) Electrostatic prep coat.
- (vii) Resist coating.
- (viii) Stencil coating.
- (ix) Powder coating.
- (4) The requirements of subsection (g) do not apply to the following activities:
- (i) Application of a touch-up coating, repair coating or textured finish to a metal part.
- (ii) Application of a powder coating to the following:
- (A) Plastic part.
- (B) Automotive-transportation plastic part.
- (C) Business machine plastic part.







- (iii) Airbrush application of coating to a metal part or plastic part using no more than 5 gallons of coating per year.
- (iv) Use of an add-on air pollution control device to comply with subsection (d).
- (v) Application of extreme high-gloss coating in a pleasure craft surface coating operation.
- (i) Work practice requirements for coating-related activities. The owner or operator of a miscellaneous metal part coating unit or miscellaneous plastic part coating unit, or both, subject to subsection (a)(1) shall comply with the following work practices for coating-related activities:
- (1) Store all VOC-containing coatings, thinners or coating-related waste materials in closed containers.
- (2) Ensure that mixing and storage containers used for VOC-containing coatings, thinners or coating-related waste materials are kept closed at all times, except when depositing or removing these coatings, thinners or waste materials.
- (3) Minimize spills of VOC-containing coatings, thinners or coating-related waste materials and clean up spills immediately.
- (4) Convey VOC-containing coatings, thinners or coating-related waste materials from one location to another in closed containers or pipes.
- (j) Work practice requirements for cleaning materials. The owner or operator of a miscellaneous metal part coating unit or miscellaneous plastic part coating unit subject to subsection (a)(1) shall comply with the following work practices for cleaning materials:
- (1) Store all VOC-containing cleaning materials and used shop towels in closed containers.
- (2) Ensure that mixing vessels and storage containers used for VOC-containing cleaning materials are kept closed at all times except when depositing or removing these materials.
- (3) Minimize spills of VOC-containing cleaning materials and clean up spills immediately.
- (4) Convey VOC-containing cleaning materials from one location to another in closed containers or pipes.
- (5) Minimize VOC emissions from cleaning of application, storage, mixing or conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.
- (k) Measurements and calculations. To determine the properties of a coating or component used in a miscellaneous metal parts surface coating process or miscellaneous plastic parts surface coating process, measurements and calculations shall be performed according to one or more of the following:
- (1) EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings, found at 40 CFR Part 60, Subpart D, Appendix A, including updates and revisions.
- (2) Manufacturer's formulation data.
- (3) Sampling and testing done in accordance with the procedures and test methods specified in Chapter 139.
- (4) Other test method demonstrated to provide results that are acceptable for purposes of determining compliance with this section if prior approval is obtained in writing from the Department.
- (5) [NA NO VOC CONTROL DEVICE]
- (6) EPA calculations information in the following:
- (i) A Guideline for Surface Coating Calculations, EPA-340/1-86-016, including updates and revisions.





(ii) Procedures for Certifying Quantity of Volatile Organic Compounds Emitted by Paint, Ink, and Other Coatings, EPA-450/3-84-019, including updates and revisions.





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

No Alternative Operations exist for this State Only facility.





# SECTION G. Emission Restriction Summary.

No emission restrictions listed in this section of the permit.



# SECTION H. Miscellaneous.

This operating permit includes sources and applicable conditions covered in the previous operating permit and supersedes that permit.

NOTE: The capacities/throughputs listed in Section A are for informational use only and should not be used as enforceable limitations.

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The following serves as a description of some of the Source IDs:

Source IDs 101 and 201 were previously the subject of Plan Approval No. 28-05050A.





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