



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: May 27, 2014

Effective Date: May 27, 2014

Expiration Date: May 27, 2019

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

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

TITLE V Permit No: 03-00060

Federal Tax Id - Plant Code: 45-3947365-2

Owner Information

Name: ALLEGHENY LUDLUM LLC

Mailing Address: 100 RIVER RD
BRACKENRIDGE, PA 15014-1537

Plant Information

Plant: ALLEGHENY LUDLUM LLC/BAGDAD

Location: 03 Armstrong County 03805 Leechburg Borough

SIC Code: 3312 Manufacturing - Blast Furnaces And Steel Mills

Responsible Official

Name: DEBORAH L CALDERAZZO

Title: DIRECTOR ENV AFFAIRS

Phone: (724) 226 - 5947

Permit Contact Person

Name: DEBORAH CALDERAZZO

Title: DIRECTOR ENV AFFAIRS

Phone: (724) 226 - 5947

[Signature] _____

MARK A. WAYNER, SOUTHWEST REGION AIR PROGRAM MANAGER

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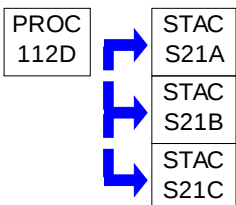
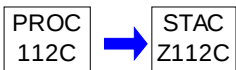
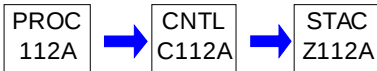
**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
112A	NO.66 LINE COIL CLEAN UNIT	10.400 Tons/HR	
112C	NO.66 LINE STRIP DRYER	5.000 MCF/HR	Natural Gas
112D	NO.66 LINE ANNEAL FURNACE	33.600 MCF/HR	Natural Gas
		10.400 Tons/HR	
112E	NO.66 LINE CURING FURNACE	39.900 MCF/HR	Natural Gas
		10.400 Tons/HR	
113A	NO.67 LINE COIL CLEAN UNIT	12.400 Tons/HR	
113C	NO.67 LINE STRIP DRYER	5.000 MMCF/HR	Natural Gas
		12.400 Tons/HR	
113D	NO.67 LINE ANNEAL FURNACE	29.400 MMCF/HR	Natural Gas
		12.400 Tons/HR	
113E	NO.67 LINE CURING FURNACE	37.900 MCF/HR	Natural Gas
114	3 MGO LINE FURNACE	11.200 MCF/HR	Natural Gas
		20.000 Tons/HR	STEEL
115A	4 MGO LINE FURNACE	11.200 MCF/HR	Natural Gas
		20.100 Tons/HR	STEEL
116	BLISS MILL	37.200 Tons/HR	
117	NO.55 NORMALIZING LINE FURNACE	80.250 MCF/HR	Natural Gas
		24.200 Tons/HR	
118	NO.56 NORMALIZING LINE FURNACE	97.300 MCF/HR	Natural Gas
		41.600 Tons/HR	
128	VEHICLE TRAVEL(PAVED ROADS)	10.000 Miles/HR	VEHICLE MILES
134	MISC SPACE HEATERS	75.000 MCF/HR	Natural Gas
C112A	NO.66 LINE COIL CLEANING BAGHOUSE		
C113A	NO.67 LINE - COIL CLEANING BAGHOUSE		
C116	BLISS MILL OIL MIST ELIMINATOR		
S113A	67 COIL CLEAN STACK		
S114A	3 MGO FURNACE STACK		
S114B	3 MGO FURNACE STACK		
S116	BLISS MILL STACK		
S117A	55 NORMALIZER STACK		
S117B	55 NORMALIZER STACK		
S117C	55 NORMALIZER STACK		
S117D	55 NORMALIZER STACK		
S117E	55 NORMALIZER STACK		
S118A	56 NORMALIZER STACK		
S118B	56 NORMALIZER STACK		
S118C	56 NORMALIZER STACK		
S118D	56 NORMALIZER STACK		
S118E	56 NORMALIZER STACK		
S118F	56 NORMALIZER STACK		

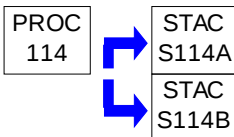
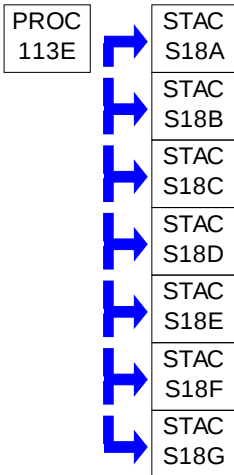
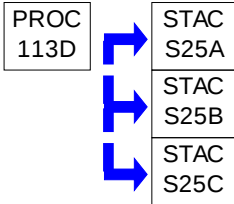
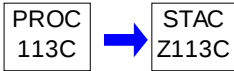
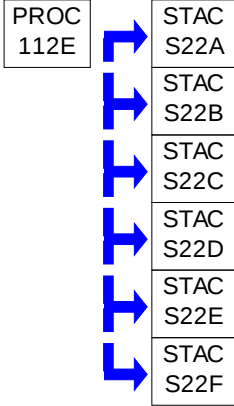
SECTION A. Site Inventory List

Source ID	Source Name	Capacity/Throughput	Fuel/Material
S18A	67 LINE CURING OVEN STACK		
S18B	67 LINE CURING OVEN STACK		
S18C	67 LINE CURING OVEN STACK		
S18D	67 LINE CURING OVEN STACK		
S18E	67 LINE CURING OVEN STACK		
S18F	67 LINE CURING OVEN STACK		
S18G	67 LINE CURING OVEN STACK		
S21A	66 ANNEAL FURN STACK		
S21B	66 ANNEAL FURN STACK		
S21C	66 ANNEAL FURN STACK		
S22A	66 CURING FURN STACK		
S22B	66 CURING FURN STACK		
S22C	66 CURING FURN STACK		
S22D	66 CURING FURN STACK		
S22E	66 CURING FURN STACK		
S22F	66 CURING FURN STACK		
S25A	67 ANNEAL FURN STACK		
S25B	67 ANNEAL FURN STACK		
S25C	67 ANNEAL FURN STACK		
S27A	4 MGO FURNACE STACK		
S27B	4 MGO FURNACE STACK		
Z112A	66 COIL CLEAN STACK		
Z112C	66 STRIP DRYER FUGITIVE		
Z113C	67 STRIP DRYER FUGITIVE		
Z128	FUGITIVE-ROADS		
Z134	MISC SPACE HEATERS		

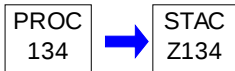
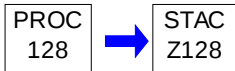
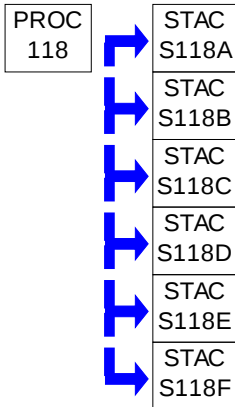
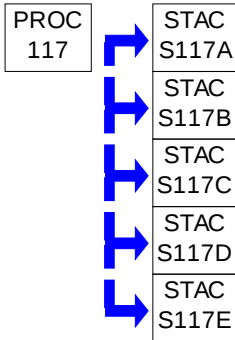
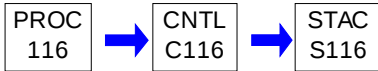
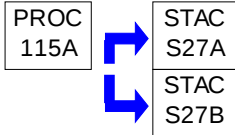
PERMIT MAPS



PERMIT MAPS



PERMIT MAPS



SECTION B. General Title V Requirements

#001 [25 Pa. Code § 121.1]

Definitions

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

#002 [25 Pa. Code § 127.512(c)(4)]

Property Rights

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

#003 [25 Pa. Code § 127.446(a) and (c)]

Permit Expiration

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

#004 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e) & 127.503]

Permit Renewal

(a) An application for the renewal of the Title V permit shall be submitted to the Department at least six (6) months, and not more than 18 months, before the expiration date of this permit. The renewal application is timely if a complete application is submitted to the Department's Regional Air Manager within the timeframe specified in this permit condition.

(b) The application for permit renewal shall include the current permit number, the appropriate permit renewal fee, a description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.

(c) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413. The application for renewal of the Title V permit shall also include submission of compliance review forms which have been used by the permittee to update information submitted in accordance with either 25 Pa. Code § 127.412(b) or § 127.412(j).

(d) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information during the permit renewal process. The permittee shall also promptly provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

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

Transfer of Ownership or Operational Control

(a) In accordance with 25 Pa. Code § 127.450(a)(4), a change in ownership or operational control of the source shall be treated as an administrative amendment if:

(1) The Department determines that no other change in the permit is necessary;

(2) A written agreement has been submitted to the Department identifying the specific date of the transfer of permit responsibility, coverage and liability between the current and the new permittee; and,

(3) A compliance review form has been submitted to the Department and the permit transfer has been approved by the Department.

SECTION B. General Title V Requirements

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

#006 [25 Pa. Code § 127.513, 35 P.S. § 4008 and § 114 of the CAA]

Inspection and Entry

(a) Upon presentation of credentials and other documents as may be required by law for inspection and entry purposes, the permittee shall allow the Department of Environmental Protection or authorized representatives of the Department to perform the following:

- (1) Enter at reasonable times upon the permittee's premises where a Title V source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;
- (2) Have access to and copy or remove, at reasonable times, records that are kept under the conditions of this permit;
- (3) Inspect at reasonable times, facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;
- (4) Sample or monitor, at reasonable times, substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act.

(c) Nothing in this permit condition shall limit the ability of the EPA to inspect or enter the premises of the permittee in accordance with Section 114 or other applicable provisions of the Clean Air Act.

#007 [25 Pa. Code §§ 127.25, 127.444, & 127.512(c)(1)]

Compliance Requirements

(a) The permittee shall comply with the conditions of this permit. Noncompliance with this permit constitutes a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one (1) or more of the following:

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application

(b) A person may not cause or permit the operation of a source, which is subject to 25 Pa. Code Article III, unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this Title V permit.

#008 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

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

SECTION B. General Title V Requirements

#009 [25 Pa. Code §§ 127.411(d) & 127.512(c)(5)]

Duty to Provide Information

- (a) The permittee shall furnish to the Department, within a reasonable time, information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.
- (b) Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of EPA along with a claim of confidentiality.

#010 [25 Pa. Code §§ 127.463, 127.512(c)(3) & 127.542]

Reopening and Revising the Title V Permit for Cause

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

#011 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

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

#012 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541.

SECTION B. General Title V Requirements

#013 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

- (a) The permittee may make minor operating permit modifications (as defined in 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (b) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to an operational flexibility change authorized by 25 Pa. Code § 127.462.

#014 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

- (a) The permittee may request administrative operating permit amendments, as defined in 25 Pa. Code § 127.450(a), according to procedures specified in § 127.450. Administrative amendments are not authorized for any amendment precluded by the Clean Air Act or the regulations thereunder from being processed as an administrative amendment.
- (b) Upon taking final action granting a request for an administrative permit amendment in accordance with § 127.450(c), the Department will allow coverage under 25 Pa. Code § 127.516 (relating to permit shield) for administrative permit amendments which meet the relevant requirements of 25 Pa. Code Article III, unless precluded by the Clean Air Act or the regulations thereunder.

#015 [25 Pa. Code § 127.512(b)]

Severability Clause

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

#016 [25 Pa. Code §§ 127.704, 127.705 & 127.707]

Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees).
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.
- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit administration fee according to the fee schedule established in 25 Pa. Code § 127.704(c) if the facility, identified in Subparagraph (iv) of the definition of the term "Title V facility" in 25 Pa. Code § 121.1, is subject to Title V after the EPA Administrator completes a rulemaking requiring regulation of those sources under Title V of the Clean Air Act.
- (f) This permit condition does not apply to a Title V facility which qualifies for exemption from emission fees under 35 P.S. § 4006.3(f).

SECTION B. General Title V Requirements**#017 [25 Pa. Code §§ 127.14(b) & 127.449]****Authorization for De Minimis Emission Increases**

(a) This permit authorizes de minimis emission increases from a new or existing source in accordance with 25 Pa. Code §§ 127.14 and 127.449 without the need for a plan approval or prior issuance of a permit modification. The permittee shall provide the Department with seven (7) days prior written notice before commencing any de minimis emissions increase that would result from either: (1) a physical change of minor significance under § 127.14(c)(1); or (2) the construction, installation, modification or reactivation of an air contamination source. The written notice shall:

- (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

(b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:

- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NO_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.

(c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:

- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
- (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
- (4) Space heaters which heat by direct heat transfer.
- (5) Laboratory equipment used exclusively for chemical or physical analysis.
- (6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more

SECTION B. General Title V Requirements

of the following:

(1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.

(2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.

(3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.

(4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.

(e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) applies to de minimis emission increases and the installation of minor sources made pursuant to this permit condition.

(f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.

(g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

(h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#018 [25 Pa. Code §§ 127.11a & 127.215]

Reactivation of Sources

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

(b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#019 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

(b) No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of this permit, the Air Pollution Control Act or the regulations promulgated thereunder, except that with prior approval of the Department, the device or technique may be used for control of malodors.

SECTION B. General Title V Requirements**#020 [25 Pa. Code §§ 127.402(d) & 127.513(1)]****Submissions**

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

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

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

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

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

#021 [25 Pa. Code §§ 127.441(c) & 127.463(e); Chapter 139; & 114(a)(3), 504(b) of the CAA]**Sampling, Testing and Monitoring Procedures**

(a) The permittee shall perform the emissions monitoring and analysis procedures or test methods for applicable requirements of this Title V permit. In addition to the sampling, testing and monitoring procedures specified in this permit, the Permittee shall comply with any additional applicable requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) The sampling, testing and monitoring required under the applicable requirements of this permit, shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139 unless alternative methodology is required by the Clean Air Act (including §§ 114(a)(3) and 504(b)) and regulations adopted thereunder.

#022 [25 Pa. Code §§ 127.511 & Chapter 135]**Recordkeeping Requirements**

(a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:

- (1) The date, place (as defined in the permit) and time of sampling or measurements.
- (2) The dates the analyses were performed.
- (3) The company or entity that performed the analyses.
- (4) The analytical techniques or methods used.
- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.

(b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.

SECTION B. General Title V Requirements

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

#023 [25 Pa. Code §§ 127.411(d), 127.442, 127.463(e) & 127.511(c)]

Reporting Requirements

(a) The permittee shall comply with the reporting requirements for the applicable requirements specified in this Title V permit. In addition to the reporting requirements specified herein, the permittee shall comply with any additional applicable reporting requirements promulgated under the Clean Air Act after permit issuance regardless of whether the permit is revised.

(b) Pursuant to 25 Pa. Code § 127.511(c), the permittee shall submit reports of required monitoring at least every six (6) months unless otherwise specified in this permit. Instances of deviations (as defined in 25 Pa. Code § 121.1) from permit requirements shall be clearly identified in the reports. The reporting of deviations shall include the probable cause of the deviations and corrective actions or preventative measures taken, except that sources with continuous emission monitoring systems shall report according to the protocol established and approved by the Department for the source. The required reports shall be certified by a responsible official.

(c) Every report submitted to the Department under this permit condition shall comply with the submission procedures specified in Section B, Condition #020(c) of this permit.

(d) Any records, reports or information obtained by the Department or referred to in a public hearing shall be made available to the public by the Department except for such records, reports or information for which the permittee has shown cause that the documents should be considered confidential and protected from disclosure to the public under Section 4013.2 of the Air Pollution Control Act and consistent with Sections 112(d) and 114(c) of the Clean Air Act and 25 Pa. Code § 127.411(d). The permittee may not request a claim of confidentiality for any emissions data generated for the Title V facility.

#024 [25 Pa. Code § 127.513]

Compliance Certification

(a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:

- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.

(b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department and EPA in accordance with the submission requirements specified in condition #020 of this section.

#025 [25 Pa. Code § 127.3]

Operational Flexibility

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

SECTION B. General Title V Requirements

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)
- (6) Section 127.462 (relating to minor operating permit amendments)
- (7) Subchapter H (relating to general plan approvals and operating permits)

(b) Unless precluded by the Clean Air Act or the regulations adopted thereunder, the permit shield authorized under 25 Pa. Code § 127.516 shall extend to operational flexibility changes made at this Title V facility pursuant to this permit condition and other applicable operational flexibility terms and conditions of this permit.

#026 [25 Pa. Code §§ 127.441(d), 127.512(i) and 40 CFR Part 68]

Risk Management

(a) If required by Section 112(r) of the Clean Air Act, the permittee shall develop and implement an accidental release program consistent with requirements of the Clean Air Act, 40 CFR Part 68 (relating to chemical accident prevention provisions) and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act (P.L. 106-40).

(b) The permittee shall prepare and implement a Risk Management Plan (RMP) which meets the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68 and the Federal Chemical Safety Information, Site Security and Fuels Regulatory Relief Act when a regulated substance listed in 40 CFR § 68.130 is present in a process in more than the listed threshold quantity at the Title V facility. The permittee shall submit the RMP to the federal Environmental Protection Agency according to the following schedule and requirements:

- (1) The permittee shall submit the first RMP to a central point specified by EPA no later than the latest of the following:
 - (i) Three years after the date on which a regulated substance is first listed under § 68.130; or,
 - (ii) The date on which a regulated substance is first present above a threshold quantity in a process.

(2) The permittee shall submit any additional relevant information requested by the Department or EPA concerning the RMP and shall make subsequent submissions of RMPs in accordance with 40 CFR § 68.190.

(3) The permittee shall certify that the RMP is accurate and complete in accordance with the requirements of 40 CFR Part 68, including a checklist addressing the required elements of a complete RMP.

(c) As used in this permit condition, the term "process" shall be as defined in 40 CFR § 68.3. The term "process" means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances or any combination of these activities. For purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.

(d) If the Title V facility is subject to 40 CFR Part 68, as part of the certification required under this permit, the permittee shall:

(1) Submit a compliance schedule for satisfying the requirements of 40 CFR Part 68 by the date specified in 40 CFR § 68.10(a); or,

(2) Certify that the Title V facility is in compliance with all requirements of 40 CFR Part 68 including the registration and submission of the RMP.

(e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation

SECTION B. General Title V Requirements

of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.

(f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:

(1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.

(2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Condition #24 of Section B of this Title V permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#027 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

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

#028 [25 Pa. Code §§ 127.516, 127.450(d), 127.449(f) & 127.462(g)]

Permit Shield

(a) The permittee's compliance with the conditions of this permit shall be deemed in compliance with applicable requirements (as defined in 25 Pa. Code § 121.1) as of the date of permit issuance if either of the following applies:

(1) The applicable requirements are included and are specifically identified in this permit.

(2) The Department specifically identifies in the permit other requirements that are not applicable to the permitted facility or source.

(b) Nothing in 25 Pa. Code § 127.516 or the Title V permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act, including the authority of the Administrator of the EPA provided thereunder.

(2) The liability of the permittee for a violation of an applicable requirement prior to the time of permit issuance.

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act.

(4) The ability of the EPA to obtain information from the permittee under Section 114 of the Clean Air Act.

(c) Unless precluded by the Clean Air Act or regulations thereunder, final action by the Department on minor or significant permit modifications, and operational flexibility changes shall be covered by the permit shield. Upon taking final action granting a request for an administrative permit amendment, the Department will allow coverage of the amendment by the permit shield in § 127.516 for administrative amendments which meet the relevant requirements of 25 Pa. Code Article III.

(d) The permit shield authorized under § 127.516 is in effect for the permit terms and conditions in this Title V permit, including administrative operating permit amendments and minor operating permit modifications.

SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

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

002 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

(a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:

(1) Construction or demolition of buildings or structures.

(2) Grading, paving and maintenance of roads and streets.

(3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.

(4) Clearing of land.

(5) Stockpiling of materials.

(6) Open burning operations.

(7) Not applicable.

(8) Not applicable.

(9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:

(i) the emissions are of minor significance with respect to causing air pollution; and

(ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

(b) An application form for requesting a determination under either subsection (a)(9) or 129.15(c) is available from the Department. In reviewing these applications, the Department may require the applicant to supply information including, but not limited to, a description of proposed control measures, characteristics of emissions, quantity of emissions, and ambient air quality data and analysis showing the impact of the source on ambient air quality. The applicant shall be required to demonstrate that the requirements of subsections (a)(9) and (c) and 123.2 (relating to fugitive particulate matter) or of the requirements of 129.15(c) have been satisfied. Upon such demonstration, the Department will issue a determination, in writing, either as an operating permit condition, for those sources subject to permit requirements under the act, or as an order containing appropriate conditions and limitations.

(c) See work practice standards.

(d) The requirements contained in subsection (a) and 123.2 do not apply to fugitive emissions arising from the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.

003 [25 Pa. Code §123.2]

Fugitive particulate matter

The Owner/Operator may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in Section C, Condition #002, if the emissions are visible at the point the emissions pass outside the person's property.

SECTION C. Site Level Requirements

004 [25 Pa. Code §123.31]

Limitations

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

005 [25 Pa. Code §123.41]

Limitations

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

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

006 [25 Pa. Code §123.42]

Exceptions

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

- (1) The presence of uncombined water is the only reason for failure of the emission to meet the limitations;
- (2) The emission results from the operation of equipment used solely to train and test persons in observing the opacity of visible emissions;
- (3) The emission results from sources specified in 25 Pa. Code Section 123.1(a)(1)-(9).

007 [25 Pa. Code §127.207]

ERC generation and creation.

Due to the shutdown of the following sources:

- No. 71 A&P Line Annealing Furnace, rated capacity 62 MMBtu/hour, AIMS Source ID 105A.
- No. 71 A&P Line HF/HNO₃ Pickling, rated capacity 30 tons of steel/hour, AIMS Source ID 105E.
- No. 2 B&P Line Shotblaster, AIMS Source ID 103A.
- No. 2 B&P Line HF/HNO₃ Pickling, rated capacity 18.8 tons of steel/hour, AIMS Source ID 103C.
- No. 19 Wet Grinder AIMS Source ID 130.
- Lee Wilson Anneal Furnaces, rated capacity 54 MMBtu/hour combined for 15 units, AIMS Source ID 126.
- Package Boiler No. 11, rated capacity 34.5 MMBtu/hour, AIMS Source ID 037.

Allegheny Ludlum has generated 30 tons of NO_x ERCs. In accordance with PA Code Title 25 § 127.207, these ERCs have been determined to be surplus, permanent, quantified and enforceable.

008 [25 Pa. Code §127.207]

ERC generation and creation.

In accordance with 25 Pa Code 127.207(7), the reduced emissions limitation of the new or modified permit of the source or facility generating the creditable emissions decrease or ERC shall be continuously verified by Department, local air pollution control agency or other State approved compliance monitoring and reporting programs. Onsite inspections will be made to verify shutdowns. If equipment has not been dismantled or removed, the owner or operator shall on an annual basis certify in writing to the Department the continuance of the shutdown.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit No. 65-000-183, Condition No.16, emission reductions of the targeted contaminants below the level specified in the RACT approval which are achieved by optimizing the effectiveness of equipment installed pursuant to this operating permit are not surplus emission reductions, and thus, may not be used to generate Emission Reduction Credits (ERC's). In order for the emission reductions to be creditable, emission reductions must satisfy the requirements of 25 PA Code Ch. 127.207, Subchapter E.

SECTION C. Site Level Requirements

010 [25 Pa. Code §129.14]

Open burning operations

The Owner/Operator shall not permit the open burning of material in a manner that:

- (1) The emissions are visible, at any time, at the point such emissions pass outside the property of the person on whose land the open burning is being conducted.
 - (2) Malodorous air contaminants from the open burning are detectable outside the property of the person on whose land the open burning is being conducted.
 - (3) The emissions interfere with the reasonable enjoyment of life or property.
 - (4) The emissions cause damage to vegetation or property.
 - (5) The emissions are or may be deleterious to human or animal health.
- (b) Exceptions: The requirements of subsection (a) do not apply where the open burning operations result from:
- (1) A fire set to prevent or abate a fire hazard, when approved by the Department and set by or under the supervision of a public officer.
 - (2) A fire set for the purpose of instructing personnel in fire fighting, when approved by the Department.
- (c) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:
- (1) As used in this subsection the following terms shall have the following meanings:
- Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.
- Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.
- (2) Subsection (a) notwithstanding, clearing and grubbing wastes may be burned subject to the following requirements:
 - (i) Upon receipt of a complaint or determination by the Department that an air pollution problem exists, the Department may order that the open burning cease or comply with subsection (b) of this section.
 - (ii) Authorization for open burning under this paragraph does not apply to clearing and grubbing wastes that have been transported.

II. TESTING REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- (a) Pursuant to 25 Pa. Code § 139.3 to at least 45 calendar days prior to commencing an emissions testing program, a test protocol shall be submitted to the Department for review and approval. The test protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- (b) Pursuant to 25 Pa. Code § 139.3 at least 15 calendar days prior to commencing an emission testing program, notification as to the date and time of testing shall be given to the appropriate Regional Office. Notification shall also be sent to the Division of Source Testing and Monitoring. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.

SECTION C. Site Level Requirements

(c) Pursuant to 25 Pa. Code Section 139.53(a)(3) within 15 calendar days after completion of the on-site testing portion of an emission test program, if a complete test report has not yet been submitted, an electronic mail notification shall be sent to the Department's Division of Source Testing and Monitoring indicating the completion date of the on-site testing.

(d) Pursuant to 40 CFR Part 60.8(a), 40 CFR Part 61.13(f) and 40 CFR Part 63.7(g) a complete test reports shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program. For those tests being conducted pursuant to 40 CFR Part 61, the, a complete test report shall be submitted within 31 days after completion of the test.

(e) Pursuant to 25 Pa. Code Section 139.53(b) a complete test report shall include a summary of the emission results on the first page of the report indicating whether each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:

1. A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
2. Permit number(s) and condition(s) which are the basis for the evaluation.
3. Summary of results with respect to each applicable permit condition.
4. Statement of compliance or non-compliance with each applicable permit condition.

(f) Pursuant to 25 Pa. Code § 139.3 to all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.

(g) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.

(h) Pursuant to 25 Pa. Code Section 139.53(a)(1) and 139.53(a)(3) all submittals, besides notifications, shall be accomplished through PSIMS*Online available through <https://www.depgreenport.state.pa.us/ecommm/Login.jsp> when it becomes available. If internet submittal cannot be accomplished, one copy of the submittal shall be sent to the Pennsylvania Department of Environmental Protection, Bureau of Air Quality, Division of Source Testing and Monitoring, 400 Market Street, 12th Floor Rachael Carson State Office Building, Harrisburg, PA 17105-8468 with deadlines verified through document postmarks. Two copies of the submittal shall be sent to Pennsylvania Department of Environmental Protection, SWRO-AQ, 400 Waterfront Dr., Pittsburgh, PA 15222.

(i) The permittee shall insure all federal reporting requirements contained in the applicable subpart of 40 CFR are followed, including timelines more stringent than those contained herein. In the event of an inconsistency or any conflicting requirements between state and the federal, the most stringent provision, term, condition, method or rule shall be used by default.

III. MONITORING REQUIREMENTS.

012 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

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

013 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The Owner/Operator shall conduct routine inspections of this facility on a weekly basis, when any air contaminant sources are in operation, to determine the presence of malodorous air emissions detectable beyond the boundaries of this facility.

SECTION C. Site Level Requirements

IV. RECORDKEEPING REQUIREMENTS.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit 65-000-183, Conditions No.12 and No.13, the Owner/Operator shall maintain records in accordance with the recordkeeping requirements of 25 PA Code Ch. 129.95. The records shall provide sufficient data and calculations to clearly demonstrate that the requirements of 25 Pa Code Ch. 129.91-94 are met and to verify compliance with the requirements of the RACT approval. At a minimum, the following records shall be kept at the facility: monthly natural gas consumption and monthly steel production. These records shall be maintained on file for not less than five years and shall be made available to the Department upon request.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Owner/Operator shall maintain and make available upon request records of all inspections of air pollution control devices.

V. REPORTING REQUIREMENTS.

016 [25 Pa. Code §127.442]

Reporting requirements.

(a) The owner or operator shall report each malfunction that occurs at this facility that poses an imminent and substantial danger to the public health and safety or the environment or which it should reasonably believe may result in citizen complaints to the Department. For purpose of this condition a malfunction is defined as any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment or source to operate in a normal or usual manner that may result in an increase in the emission of air contaminants. Examples of malfunctions that may result in citizen complaints include but are not limited to: large dust plumes, heavy smoke, a spill or release that results in a malodor that is detectable outside the property of the person on whose land the source is being operated.

(b) When the malfunction poses an imminent and substantial danger to the public health and safety or the environment, the notification shall be submitted to the Department no later than one hour after the incident. All other malfunctions that must be reported under subsection (a) shall be reported to the Department no later than the next business day.

(c) The report 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.

(d) The owner or operator shall notify the Department immediately when corrective measures have been accomplished.

(e) Subsequent to the malfunction, the owner/operator shall submit a full written report to the Department including the items identified in (c) and corrective measures taken on the malfunction within 15 days, if requested.

(f) The owner/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.

(g) Malfunctions shall be reported to the Department at the following address:

PADEP
Office of Air Quality
400 Waterfront Drive
Pittsburgh, PA 15222-4745
412-442-4000

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

(a) The Owner/Operator shall provide the Department with a statement, in a form as the Department may prescribe, for classes or categories of sources, showing the actual emissions of oxides of nitrogen and VOCs from that source for each reporting period, a description of the method used to calculate the emissions and the time period over which the calculation is based. The statement shall contain a certification by a company officer or the plant manager that the information contained in the statement is accurate.

(b) Annual emission statements are due by March 1 for the preceeding calendar year. Statements shall provide data consistent with requirements and guidance developed by the EPA. The guidance is available from:

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

(c) The Department may require more frequent submittals upon determination that one or more of the following applies:

(1) A more frequent submission is required by the EPA.

(2) Analysis of the data on a more frequent basis is necessary to implement the requirements of the Act.

018 [25 Pa. Code §135.3]**Reporting**

(a) A person who owns or operates a source to which this chapter applies, and who has previously been advised by the Department to submit a source report, shall submit by March 1 of each year a source report for the preceding calendar year. The report shall include information for all previously reported sources, new sources which were first operated during the proceeding calendar year and sources modified during the same period which were not previously reported.

(b) N/A

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

VI. WORK PRACTICE REQUIREMENTS.**# 019 [25 Pa. Code §123.1]****Prohibition of certain fugitive emissions**

For any source specified in Section C, Condition #002, the permittee shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

(1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads or the clearing of land.

(2) Application of asphalt, oil, or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.

(3) Paving and maintenance of roadways.

(4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

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

The Owner/Operator shall perform a weekly inspection of all control devices at this facility, including but not limited to, visual observations of the control equipment exhaust.

SECTION C. Site Level Requirements

VII. ADDITIONAL REQUIREMENTS.

021 [25 Pa. Code §137.4]

Standby plans

- (a) This section applies to the following classes of sources located in the counties identified in subsection (b):
 - (3) Manufacturing industries of the following classifications which employ more than 20 employees at any one location:
 - (i) Primary and secondary metals industries.
- (c) Any person responsible for the operation of a source identified in subsection (a) and located in a county classified in subsection (b) as requiring a standby plan shall submit standby plans for reducing the emission of air contaminants from that source during alert, warning and emergency levels to the Department within 90 days of the Department's request. The plans shall be designed to reduce or eliminate the emissions of air contaminants in accordance with the objectives in 137.11-137.14 (relating to level actions). The plans shall be in writing on forms published and distributed by the Department and shall identify the approximate amount of reduction of various air contaminants and a description of the manner in which the reductions will be achieved.
- (d) If the Department determines that a standby plan does not provide for effectively achieving the objectives in 137.11-137.14, the Department may disapprove the plan, state its reasons for the disapproval and either order the preparation of an amended plan within a time period specified in the order or issue, by order, a plan to replace the disapproved plan.
- (e) The Department may amend or otherwise change a standby plan if it determines that good cause exists for the action. An amendment or change will be in writing and will be accompanied by a notice of sufficient cause for the action.
- (f) For facilities required to submit standby plans under subsection (e), during a forecast, alert, warning or emergency level, the standby plan shall be made available by the person responsible for the facility to employees of the Department on the premises of the source.

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

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

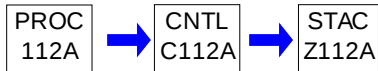
SECTION D. Source Level Requirements

Source ID: 112A

Source Name: NO.66 LINE COIL CLEAN UNIT

Source Capacity/Throughput:

10.400 Tons/HR

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

SECTION D. Source Level Requirements

Source ID: 112C

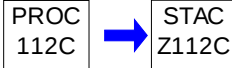
Source Name: NO.66 LINE STRIP DRYER

Source Capacity/Throughput:

5.000 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: COMB. SOURCES
FURNACES



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

SECTION D. Source Level Requirements

Source ID: 112D

Source Name: NO.66 LINE ANNEAL FURNACE

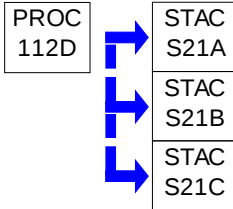
Source Capacity/Throughput:

33.600 MCF/HR

Natural Gas

10.400 Tons/HR

Conditions for this source occur in the following groups: FURNACES
RACT COMB. SOURCES



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit 65-000-183, Condition No.5, NO_x emissions from this furnace shall not exceed 12.0 pounds/hour and 50 tons in any 12 consecutive month period.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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



SECTION D. Source Level Requirements

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 112E

Source Name: NO.66 LINE CURING FURNACE

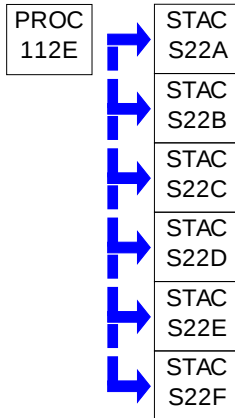
Source Capacity/Throughput:

39.900 MCF/HR

Natural Gas

10.400 Tons/HR

Conditions for this source occur in the following groups: FURNACES
RACT COMB. SOURCES



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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



SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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

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

SECTION D. Source Level Requirements

Source ID: 113A

Source Name: NO.67 LINE COIL CLEAN UNIT

Source Capacity/Throughput:

12.400 Tons/HR



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

Sections of PART 64

Applicability

NO. 67 LINE COIL CLEANING / BAGHOUSE (C113A)

For Compliance Assurance Monitoring (CAM), the permittee will monitor for the presence of visible emissions from the No. 67 Line Coil Cleaning baghouse exhaust to demonstrate a reasonable assurance that the baghouse controls particulate matter to levels in compliance with the emissions restrictions in this permit.

1. Indicator - Visible Emissions Monitoring

(a) Measurement Approach:

Vent exhaust will be observed on a daily basis to determine if visible emissions are present.

(b) Indicator Range:

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

(c) Performance Criteria:

(i) Data Representativeness: Vent exhaust observations will be performed when No. 67 Line Coil Cleaning is operating during daylight hours. The vent exhaust condition will be recorded and each value will be compared to the acceptable range. A "normal" observation indicates that the baghouse is operating properly.

(ii) Verification of Operational Status: Upon completion of an "abnormal" observation, an inspection shall be conducted and if necessary, the baghouse/compartment will be isolated or shut down for repairs.

(iii) QA/QC Practices and Criteria: The personnel conducting the vent exhaust observations shall be familiar with normal stack conditions.

(iv) Monitoring Frequency: Due to the low potential emissions from this source (7.0 tons per year total particulate), daily observations will be performed. This frequency has proven to be reasonable and adequately demonstrates that the baghouse is operating properly. This approach routinely verifies that abnormal visible emissions are not present and reasonably justifies that particulate matter emissions are not exceeding the regulatory limitation of 10.3 lb/hr (based on the regulatory formula $A=0.76e^{0.42}$).

(v) Data Collection Procedures: Observation records are documented on a log sheet and shall be maintained for a minimum of 5-years. Records shall be made available to the

SECTION D. Source Level Requirements

Department upon request.
(vi) Averaging Period: Not applicable.

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

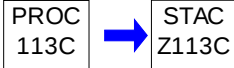
SECTION D. Source Level Requirements

Source ID: 113C

Source Name: NO.67 LINE STRIP DRYER

Source Capacity/Throughput: 5.000 MMCF/HR Natural Gas
12.400 Tons/HR

Conditions for this source occur in the following groups: COMB. SOURCES
FURNACES



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

SECTION D. Source Level Requirements

Source ID: 113D

Source Name: NO.67 LINE ANNEAL FURNACE

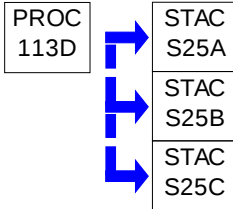
Source Capacity/Throughput:

29.400 MMCF/HR

Natural Gas

12.400 Tons/HR

Conditions for this source occur in the following groups: FURNACES
RACT COMB. SOURCES

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

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit 65-000-183, Condition No.5, NO_x emissions from this furnace shall not exceed 10.0 pounds/hour and 44 tons in any 12 consecutive month period.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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



SECTION D. Source Level Requirements

*** Permit Shield in Effect. ***

SECTION D. Source Level Requirements

Source ID: 113E

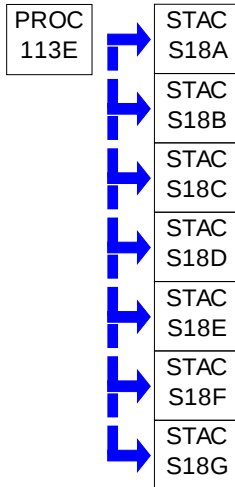
Source Name: NO.67 LINE CURING FURNACE

Source Capacity/Throughput:

37.900 MCF/HR

Natural Gas

Conditions for this source occur in the following groups: FURNACES
RACT COMB. SOURCES



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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



SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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

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

SECTION D. Source Level Requirements

Source ID: 114

Source Name: 3 MGO LINE FURNACE

Source Capacity/Throughput:

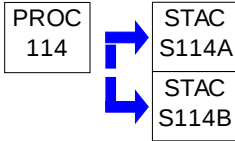
11.200 MCF/HR

Natural Gas

20.000 Tons/HR

STEEL

Conditions for this source occur in the following groups: COMB. SOURCES
FURNACES

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

SECTION D. Source Level Requirements

Source ID: 115A

Source Name: 4 MGO LINE FURNACE

Source Capacity/Throughput:

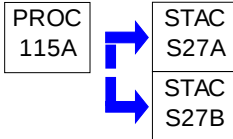
11.200 MCF/HR

Natural Gas

20.100 Tons/HR

STEEL

Conditions for this source occur in the following groups: COMB. SOURCES
FURNACES

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

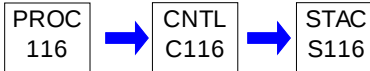
***** Permit Shield in Effect. *****

SECTION D. Source Level Requirements

Source ID: 116

Source Name: BLISS MILL

Source Capacity/Throughput: 37.200 Tons/HR



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

003 [40 CFR Part 64 Compliance Assurance Monitoring for Major Stationary Sources §40 CFR 64.2]

Sections of PART 64

Applicability

BLISS MILL / OIL MIST ELIMINATOR (C116)

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

1. Indicator - Visible Emissions Monitoring

(a) Measurement Approach:

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

(b) Indicator Range:

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

(c) Performance Criteria:

(i) Data Representativeness: Stack exhaust observations will be performed when the Bliss Mill is operating during daylight hours. The stack exhaust condition will be recorded and each value will be compared to the acceptable range. A "normal" observation indicates that the oil mist eliminator is operating properly.

(vi) Verification of Operational Status: Upon completion of an "abnormal" observation, an inspection shall be conducted and if necessary, the oil mist eliminator will be evaluated

SECTION D. Source Level Requirements

and shut down for repairs.

(ii) QA/QC Practices and Criteria: The personnel conducting the stack exhaust observations shall be familiar with normal stack conditions.

(iii) Monitoring Frequency: Daily observations will be performed. This frequency has proven to be reasonable and adequately demonstrates that the oil mist eliminator is operating properly. This approach routinely verifies that abnormal visible emissions are not present and reasonably justifies that particulate matter emissions are not exceeding the limitation of 0.04 grains/DSCF.

(iv) Data Collection Procedures: Observation records are documented on a log sheet and shall be maintained for a minimum of 5-years. Records shall be made available to the Department upon request.

(v) Averaging Period: Not applicable.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain records of the required visual observations including, incidents where the stack opacity of any of the above sources equals or exceeds 20 percent and any action taken as a result of these opacity observations. These records shall also include the date, time, name and title of the observer.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

SECTION D. Source Level Requirements

Source ID: 117

Source Name: NO.55 NORMALIZING LINE FURNACE

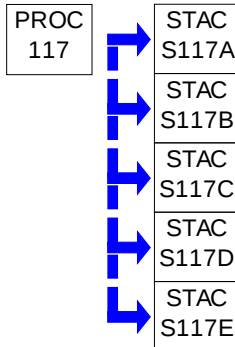
Source Capacity/Throughput:

80.250 MCF/HR

Natural Gas

24.200 Tons/HR

Conditions for this source occur in the following groups: FURNACES
LARGE COMB. SOURCES



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit 65-000-183, Condition No.5, NO_x emissions from this furnace shall not exceed 13.0 pounds/hour and 56 tons in any 12 consecutive month period.

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall utilize a portable analyzer to measure NO_x and CO emissions from this furnace. NO_x and CO emissions shall be measured on an annual basis, provided this source operates for more than 750 hours in any consecutive 12 month period. The permittee shall quantify NO_x emissions on a monthly basis.

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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



SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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

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

SECTION D. Source Level Requirements

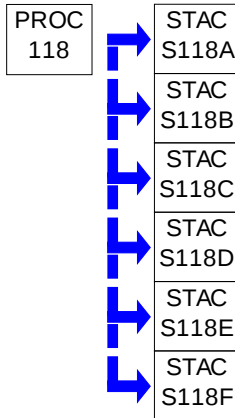
Source ID: 118

Source Name: NO.56 NORMALIZING LINE FURNACE

Source Capacity/Throughput: 97.300 MCF/HR
41.600 Tons/HR

Natural Gas

Conditions for this source occur in the following groups: FURNACES
LARGE COMB. SOURCES



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit 65-000-183, Condition No.5, NOx emissions from this furnace shall not exceed 16.0 pounds/hour and 68 tons in any 12 consecutive month period.

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall utilize a portable analyzer to measure NOx and CO emissions from this furnace. NOx and CO emissions shall be measured on an annual basis, provided this source operates for more than 750 hours in any consecutive 12 month period. The permittee shall quantify NOx emissions on a monthly basis.

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

SECTION D. Source Level Requirements**VI. WORK PRACTICE REQUIREMENTS.**

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

VII. ADDITIONAL REQUIREMENTS.

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

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

SECTION D. Source Level Requirements

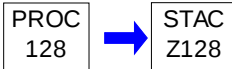
Source ID: 128

Source Name: VEHICLE TRAVEL(PAVED ROADS)

Source Capacity/Throughput:

10.000 Miles/HR

VEHICLE MILES

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

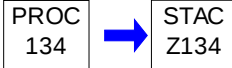
SECTION D. Source Level Requirements

Source ID: 134

Source Name: MISC SPACE HEATERS

Source Capacity/Throughput: 75.000 MCF/HR Natural Gas

Conditions for this source occur in the following groups: COMB. SOURCES
FURNACES



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

At a minimum, the permittee shall verify NO_x emission rates using the most recent AP-42 emission factors, in conjunction with fuel usage records, or other methods with prior approval from the Department.

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The Owner/Operator shall maintain records of monthly natural gas usage for these miscellaneous space heaters.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

SECTION E. Source Group Restrictions.

Group Name: COMB. SOURCES

Group Description: < 20 MM Btu/hr

Sources included in this group

ID	Name
112C	NO.66 LINE STRIP DRYER
113C	NO.67 LINE STRIP DRYER
114	3 MGO LINE FURNACE
115A	4 MGO LINE FURNACE
134	MISC SPACE HEATERS

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

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

In accordance with RACT Operating Permit No. 63-000-183, Condition No.8, the Owner/Operator shall maintain and operate all combustion sources with individual rated heat inputs of less than 20 MM Btu/hr. as identified, subject to 25 Pa Code Ch. 129.93(c)(1) in accordance with the manufacturers' specifications.

VII. ADDITIONAL REQUIREMENTS.

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

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

SECTION E. Source Group Restrictions.

Group Name: FURNACES

Group Description: Combustion Sources (Nat.Gas)

Sources included in this group

ID	Name
112C	NO.66 LINE STRIP DRYER
112D	NO.66 LINE ANNEAL FURNACE
112E	NO.66 LINE CURING FURNACE
113C	NO.67 LINE STRIP DRYER
113D	NO.67 LINE ANNEAL FURNACE
113E	NO.67 LINE CURING FURNACE
114	3 MGO LINE FURNACE
115A	4 MGO LINE FURNACE
117	NO.55 NORMALIZING LINE FURNACE
118	NO.56 NORMALIZING LINE FURNACE
134	MISC SPACE HEATERS

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

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

002 [25 Pa. Code §123.21]

General

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

For sources in this group with stacks directly exhausting emissions to the atmosphere, the permittee shall perform visual observations of stack opacity from these sources on a weekly basis for the purpose of determining compliance with 123.41 or any other alternative applicable opacity standard.

SECTION E. Source Group Restrictions.

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

007 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The Owner/Operator shall maintain records containing at a minimum;

- (i) a Certification of sulfur content from the fuel supplier, or
- (ii) a Certification from fuel supplier verifying the natural gas is pipeline grade gas or from a public utility.

008 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain records of the required visual observations including, incidents where the stack opacity of any of the above sources equals or exceeds 20 percent and any action taken as a result of these opacity observations. These records shall also include the date, time, name and title of the observer.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

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

SECTION E. Source Group Restrictions.

Group Name: LARGE COMB. SOURCES

Group Description: > 50 MM Btu/hr

Sources included in this group

ID	Name
117	NO.55 NORMALIZING LINE FURNACE
118	NO.56 NORMALIZING LINE FURNACE

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall utilize a portable analyzer to measure emission rates of NOx and CO for these combustion sources. At a minimum, periodic monitoring shall occur once in each 12 consecutive month period for each source in this group. This requirement shall not apply if actual operating hours for this source do not exceed 750 hours in any consecutive 12 month period.

The permittee shall quantify emissions on a monthly basis using the most recent source specific testing and/or monitoring results or other methods with prior written Department approval.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit No.65-000-183, Condition No.11, the Owner/Operator shall maintain records of natural gas usage, calculated monthly, for all combustion sources with an individual rated heat input greater than 50 MM Btu/hr.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

In accordance with RACT Operating Permit No.65-000-183, Condition No.7, the Owner/Operator shall maintain and operate these combustion sources subject to 25 Pa Code Ch. 129.92 within manufacturers' specifications and in a manner consistent with good operating procedures.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

SECTION E. Source Group Restrictions.

Group Name: RACT COMB. SOURCES

Group Description: > 20 < 50 MM Btu/hr

Sources included in this group

ID	Name
112D	NO.66 LINE ANNEAL FURNACE
112E	NO.66 LINE CURING FURNACE
113D	NO.67 LINE ANNEAL FURNACE
113E	NO.67 LINE CURING FURNACE

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.**# 001 [25 Pa. Code §127.511]****Monitoring and related recordkeeping and reporting requirements.**

The permittee shall utilize a portable analyzer to measure emission rates of NO_x and CO for these combustion sources. At a minimum, periodic monitoring shall occur once in each 12 month consecutive period for each source in this group. This requirement shall not apply if actual operating hours for subject sources do not exceed 750 hours in any given consecutive 12 month period.

The permittee shall quantify emissions on a monthly basis using the most recent source specific testing and/or monitoring results or other methods with prior written Department approval.

IV. RECORDKEEPING REQUIREMENTS.**# 002 [25 Pa. Code §129.93]****Presumptive RACT emission limitations**

In accordance with RACT Operating Permit No. 65-000-137, Condition No.10, the Permittee shall maintain records for each adjustment conducted during the performance of the annual adjustment or tune-up on each combustion source. These records shall contain, at a minimum, the following information;

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.**# 003 [25 Pa. Code §129.93]****Presumptive RACT emission limitations**

The permittee shall perform an annual adjustment or tune-up as required by RACT Operating Permit No. 65-000-183, Condition No.9, for these sources. This adjustment shall include, at a minimum, the following:

- (i) Inspection, adjustment, cleaning or replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
- (ii) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO_x, and

SECTION E. Source Group Restrictions.

to the extent practicable minimize emissions of CO.

(iii) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

004 [25 Pa. Code §129.93]**Presumptive RACT emission limitations**

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

VII. ADDITIONAL REQUIREMENTS.

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

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



SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.

**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.

SECTION H. Miscellaneous.

INSIGNIFICANT ACTIVITIES

The following sources qualify as insignificant activities and have no applicable requirements, emission limits, monitoring and/or recordkeeping:

- Bagdad Wastewater Treatment Plant
- Process Tanks and Non-VOC/HAP Tanks
- Hoffman Filters
- Alkali Cleaning
- Parts cleaners

Since a new permit # has been generated for Bagdad facility, it is shown in efacts as a new permit. All the requirements for this facility's sources have been carried over from the TVOP-65-00183.



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