

63-00632

PVS STEEL SERVICES INC/ALLENPORT PLT



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: December 27, 2017 Effective Date: December 27, 2017

Expiration Date: December 27, 2022

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

> The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated.

> > State Only Permit No: 63-00632

Federal Tax Id - Plant Code: 46-4572750-1

Owner Information		
Name: PVS STEEL SVC INC Mailing Address: 2 WHEELING PITTSBURGH STEEL DR PITTSBURGH, PA 15412		
Plant Ir	nformation	
Plant: PVS STEEL SERVICES INC/ALLENPORT PLT		
Location: 63 Washington County	63912 Allenport Borough	
SIC Code: 2819 Manufacturing - Industrial Inorganic Chemica	als, Nec	
Respons	sible Official	
Name: ANDREW ROTH		
Title: PLANT MANAGER		
Phone: (412) 680 - 3263		
Permit Co	ontact Person	
Name: ANDREW ROTH		
Title: PLANT MGR		
Phone: (412) 680 - 3263		
[Signature]		
MARK R GOROG P.F. ENVIRONMENTAL PROGRAM MANAGER SOLITHWEST REGION		

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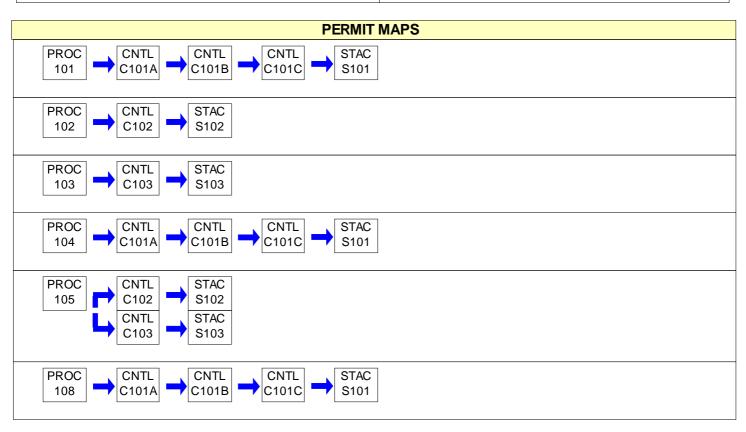
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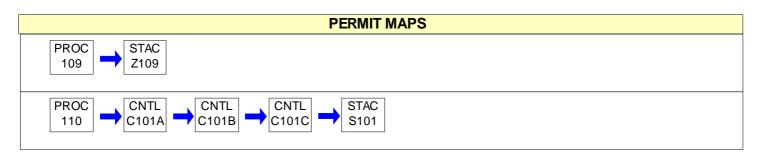


SECTION A. Site Inventory List

D Source Name	Capacity/	Throughput	Fuel/Material
SPRAY ROASTER	32.000	MMBTU/HR	
	8.200	Tons/HR	
IRON OXIDE STORAGE BIN A			
IRON OXIDE STORAGE BIN B			
ACID TRUCK UNLOADING/LOADING STATION			
IRON OXIDE BAGGING/TRUCK LOADING			
8 WPL/HCL STORAGE TANKS			
PLANT PAVED ROADS & SURFACES			
RAILCAR UNLOADING			
ABSORBER			
SCRUBBER 1			
SCRUBBER 2			
BIN A BAGHOUSE			
BIN B BAGHOUSE			
ACID TRUCK/STORAGE TANK SCRUBBER			
SPRAY ROASTER STACK			
BIN A BAGHOUSE STACK			
BIN B BAGHOUSE STACK			
ROADS FUGITIVE			
	SPRAY ROASTER IRON OXIDE STORAGE BIN A IRON OXIDE STORAGE BIN B ACID TRUCK UNLOADING/LOADING STATION IRON OXIDE BAGGING/TRUCK LOADING 8 WPL/HCL STORAGE TANKS PLANT PAVED ROADS & SURFACES RAILCAR UNLOADING ABSORBER SCRUBBER 1 SCRUBBER 2 BIN A BAGHOUSE BIN B BAGHOUSE ACID TRUCK/STORAGE TANK SCRUBBER SPRAY ROASTER STACK BIN B BAGHOUSE STACK BIN B BAGHOUSE STACK	SPRAY ROASTER 32.000 RON OXIDE STORAGE BIN A IRON OXIDE STORAGE BIN B ACID TRUCK UNLOADING/LOADING STATION IRON OXIDE BAGGING/TRUCK LOADING 8 WPL/HCL STORAGE TANKS PLANT PAVED ROADS & SURFACES RAILCAR UNLOADING ABSORBER SCRUBBER 1 SCRUBBER 2 BIN A BAGHOUSE BIN B BAGHOUSE ACID TRUCK/STORAGE TANK SCRUBBER SPRAY ROASTER STACK BIN A BAGHOUSE STACK BIN B BAGHOUSE STACK	SPRAY ROASTER 32.000 MMBTU/HR 8.200 Tons/HR IRON OXIDE STORAGE BIN A IRON OXIDE STORAGE BIN B ACID TRUCK UNLOADING/LOADING STATION IRON OXIDE BAGGING/TRUCK LOADING 8 WPL/HCL STORAGE TANKS PLANT PAVED ROADS & SURFACES RAILCAR UNLOADING ABSORBER SCRUBBER 1 SCRUBBER 2 BIN A BAGHOUSE BIN B BAGHOUSE ACID TRUCK/STORAGE TANK SCRUBBER SPRAY ROASTER STACK BIN A BAGHOUSE STACK BIN B BAGHOUSE STACK













#001 [25 Pa. Code § 121.1]

Definitions.

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

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

- (a) This operating permit is issued for a fixed term of five (5) years and shall expire on the date specified on Page 1 of this permit.
- (b) The terms and conditions of the expired permit shall automatically continue pending issuance of a new operating permit, provided the permittee has submitted a timely and complete application and paid applicable fees required under 25 Pa. Code Chapter 127, Subchapter I and the Department is unable, through no fault of the permittee, to issue or deny a new permit before the expiration of the previous permit.

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

Permit Renewal.

- (a) The permittee shall submit a timely and complete application for renewal of the operating permit to the appropriate Regional Air Program Manager. The application for renewal of the operating permit shall be submitted at least six (6) months and not more than 18 months before the expiration date of this permit.
- (b) The application for permit renewal shall include the current permit number, a description of any permit revisions that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. An application is complete if it contains sufficient information to begin processing the application, has the applicable sections completed and has been signed by a responsible official.
- (c) The permittee shall submit with the renewal application a fee for the processing of the application and an additional annual administrative fee as specified in 25 Pa. Code § 127.703(b) and (c). The fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" and shall be for the amount specified in the following schedule specified in 25 Pa. Code § 127.703(b) and (c).
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.
- (d) The renewal application shall also include submission of proof that the local municipality and county, in which the facility is located, have been notified in accordance with 25 Pa. Code § 127.413.
- (e) The application for renewal of the operating permit shall also include submission of supplemental compliance review forms in accordance with the requirements of 25 Pa. Code § 127.412(b) and § 127.412(j).
- (f) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information as necessary to address any requirements that become applicable to the source after the permittee submits a complete application, but prior to the date the Department takes action on the permit application.

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

- (a) The permittee shall pay fees according to the following schedule specified in 25 Pa. Code § 127.703(b):
 - (1) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension,







modification, revision, renewal, and re-issuance of each operating permit or part thereof.

- (b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).
 - (1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.
 - (2) Three hundred dollars for applications filed during the 2000-2004 calendar years.
 - (3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.
- (c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund".

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

Transfer of Operating Permits.

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

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

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

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

Compliance Requirements.

(a) The permittee shall comply with the conditions of this operating permit. Noncompliance with this permit constitutes





a violation of the Clean Air Act and the Air Pollution Control Act and is grounds for one or more of the following:

- (1) Enforcement action
- (2) Permit termination, revocation and reissuance or modification
- (3) Denial of a permit renewal application
- (b) A person may not cause or permit the operation of a source which is subject to 25 Pa. Code Article III unless the source(s) and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued for the source is operated and maintained in accordance with specifications in the applications and the conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to 25 Pa. Code Chapter 127 in a manner inconsistent with good operating practices.
- (c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

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

Duty to Provide Information.

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

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

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

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

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

Operating Permit Modifications

(a) The permittee is authorized to make administrative amendments, minor operating permit modifications and

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significant operating permit modifications, under this permit, as outlined below:

- (b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.
- (c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.
- (d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#012 [25 Pa. Code § 127.441]

Severability Clause.

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

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

- (a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:
 - (1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.
- (2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.
- (b) The Department may disapprove or condition de minimis emission increases at any time.
- (c) Except as provided below in (d), the permittee is authorized to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:







- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
 - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

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

- (1) Section 127.14 (relating to exemptions)
- (2) Section 127.447 (relating to alternative operating scenarios)
- (3) Section 127.448 (relating to emissions trading at facilities with Federally enforceable emissions caps)
- (4) Section 127.449 (relating to de minimis emission increases)
- (5) Section 127.450 (relating to administrative operating permit amendments)







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

#015 [25 Pa. Code § 127.11]

Reactivation

- (a) The permittee may not reactivate a source that has been out of operation or production for at least one year unless the reactivation is conducted in accordance with a plan approval granted by the Department or in accordance with reactivation and maintenance plans developed and approved by the Department in accordance with 25 Pa. Code § 127.11a(a).
- (b) A source which has been out of operation or production for more than five (5) years but less than 10 years may be reactivated and will not be considered a new source if the permittee satisfies the conditions specified in 25 Pa. Code § 127.11a(b).

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

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

#017 [25 Pa. Code § 121.9]

Circumvention.

No person may permit the use of a device, stack height which exceeds good engineering practice stack height, dispersion technique or other technique which, without resulting in reduction of the total amount of air contaminants emitted, conceals or dilutes an emission of air contaminants which would otherwise be in violation of 25 Pa. Code Article III, except that with prior approval of the Department, the device or technique may be used for control of malodors.

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

Reporting Requirements.

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.
- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

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

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





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

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

Sampling, Testing and Monitoring Procedures.

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

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

Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
 - (1) The date, place (as defined in the permit) and time of sampling or measurements.
 - (2) The dates the analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of the analyses.
 - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

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





SECTION 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) Sources and classes of sources other than those identified in paragraphs (1)-(5), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.

003 [25 Pa. Code §123.2]

Fugitive particulate matter

A person may not permit fugitive particulate matter to be emitted into the outdoor atmosphere from a source specified in 25 Pa Code Section 123.1, (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

004 [25 Pa. Code §123.41]

Limitations

The Owner/Operator shall not permit the emission into the outdoor atmosphere of visible air contaminants from any source 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.

005 [25 Pa. Code §123.42]

Exceptions

The limitations of opacity (relating to limitations) shall not apply to a visible emission in any of the following instances:

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

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SECTION C. **Site Level Requirements**

(3) When the emission results from sources specified in 25 Pa Code Section 123.1, (relating to prohibition of certain fugitive emissions).

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

As determined by the Department, no objectionable odors from the operation of this facility shall be detectable beyond the property line.

007 [25 Pa. Code §127.444]

Compliance requirements.

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

008 [25 Pa. Code §129.14]

Open burning operations

- (a) Air basins. No person may permit the open burning of material in an air basin.
- (b) Outside of air basins. No person may permit the open burning of material in an area outside of air basins 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.
- (c) Exceptions: The requirements of subsections (a) and (b) 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.
 - (3) A fire set for the prevention and control of disease or pests, when approved by the Department.
- (4) A fire set in conjunction with the production of agricultural commodities in their unmanufactured state on the premises of the farm operation.
- (5) A fire set for the purpose of burning domestic refuse, when the fire is on the premises of a structure occupied solely as a dwelling by two families or less and when the refuse results from the normal occupancy of such structure.
 - (6) A fire set solely for recreational or ceremonial purposes.
 - (7) A fire set solely for cooking food.

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SECTION C. Site Level Requirements

- (d) 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 in a basin subject to the following requirements:
 - (i) Air curtain destructors shall be used when burning clearing and grubbing wastes.
- (ii) Each proposed use of air curtain destructors shall be reviewed and approved by the Department in writing with respect to equipment arrangement, design and existing environmental conditions prior to commencement of burning. Proposals approved under this subparagraph need not obtain plan approval or operating permits under Chapter 127 (relating to construction modification, reactivation and operation of sources).
- (iii) Approval for use of an air curtain destructor at one site may be granted for a specified period not to exceed 3 months, but may be extended for additional limited periods upon further approval by the Department.
- (iv) The Department reserves the right to rescind approval granted if a determination by the Department indicates that an air pollution problem exists.
- (3) Subsection (b) notwithstanding clearing and grubbing wastes may be burned outside of an air basin, subject to the following limitations:
- (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 transported from an air basin for disposal outside of an air basin.
- (4) During an air pollution episode, open burning is limited by Chapter 137 (relating to air pollution episodes) and shall cease as specified in such chapter.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

009 [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.





SECTION C. Site Level Requirements

010 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall prepare an operation and maintenance plan for each emission control device. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

- (i) Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
- (ii) Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
- (iii) Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;
- (iv) Require an inspection of each scrubber at intervals of no less than 3 months with:
- (A) Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
- (B) Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
- (C) Repair or replacement of mist eliminator elements as needed;
- (D) Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
- (E) Adjustment of damper settings for consistency with the required air flow.
- (v) If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Department may be used.
- (vi) The owner or operator shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan, or other procedures for corrective action as may be appropriate.
- (vii) The owner or operator shall maintain a record of each inspection, including each item identified in paragraph (iv) of this condition, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator of each hydrochloric acid regeneration plant shall develop and implement a written maintenance program. The program shall require:

- (i) Performance of the manufacturer's recommended maintenance at the recommended intervals on all required systems and components;
- (ii) Initiation of procedures for appropriate and timely repair, replacement, or other corrective action within 1 working day of detection; and
- (iii) Maintenance of a daily record, signed by a responsible maintenance official, showing the date of each inspection for each requirement, the problems found, a description of the repair, replacement, or other action taken, and the date of repair or replacement.







SECTION C. Site Level Requirements

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall perform observations for and record the following on a daily basis while the facility is operating:

- 1. Visible stack emissions
- 2. Malodors
- 3. Visible fugitive emissions

These observations do not require performance by a person certified as a qualified observer for EPA Method 9 for Visual Determination of the Opacity of Emissions from Stationary Sources. These records shall be kept on site for a period of 5 years and be made available to the Department upon request.

IV. RECORDKEEPING REQUIREMENTS.

013 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall maintain records for 5 years from the date of each record of:

- (1) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
- (2) The occurrence and duration of each malfunction of the process or air pollution control equipment;
- (3) All maintenance performed on the process or air pollution control equipment;
- (4) Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
- (5) All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form;
- (6) All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements and measurements as may be necessary to determine the conditions of the performance tests;
- (7) All results of performance tests.

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Department for the life of the affected emission sources and control devices.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Records of maintenance performed on all air pollution control equipment or each hydrochloric acid regeneration plant shall be maintained either in a permanently bound logbook or electronically and shall be made available to the Department at all times. The records shall contain the following information at a minimum: the date, time, and nature of the maintenance done, and the name of the performing technician and shall be maintained for a minimum of 5 years from the date of each record.





SECTION C. Site Level Requirements

016 [25 Pa. Code §135.5]

Recordkeeping

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

٧. REPORTING REQUIREMENTS.

017 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall maintain 12-month rolling records of the throughput for waste pickle liquor processed, iron oxide production and regenerated acid production.

#018 [25 Pa. Code §127.442]

Reporting requirements.

Malfunction reporting shall be conducted as follows:

- a. For the 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 may 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 on whose land the source is being operated.
- b. When the malfunction poses an imminent and substantial danger to the public health and safety, potential harm to the environment, the Owner/Operator shall report the incident to the Department within one hour of discovery. The Owner/Operator shall also notify the Department within one hour, when corrective measures have been accomplished.

All other malfunctions shall be reported to the Department no later than the next business day.

- c. Initial reporting of the malfunction shall identify the following items to the extent known:
- i. name and location of the facility;
- ii. nature and cause of the malfunction;
- iii. time when the malfunction or breakdown was first observed;
- iv. expected duration of increased emissions; and
- v. estimated rate of emissions.
- d. Malfunctions shall be reported to the Department by e-mail (addresses will be provided by the Department) or by regular mail at the address below:

PA DEP Office of Air Quality 400 Waterfront Drive Pittsburgh, PA 15222-4745

412-442-4000

e. If requested by the Department, the Owner/Operator shall submit a full written report to the Department including final determinations of the items identified in c. and the corrective measures taken on the malfunction. The report shall be submitted within 15 days of the Department's request or accomplishing corrective measures, whichever is later.







SECTION C. **Site Level Requirements**

019 [25 Pa. Code §135.3] Reporting

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

VI. WORK PRACTICE REQUIREMENTS.

020 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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, water 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.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standards.

022 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall maintain each emission source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all times, including during any period of startup, shutdown, or malfunction.

023 [25 Pa. Code §127.441]

Operating permit terms and conditions.

An emission source at this facility shall not operate in the event that its emissions control equipment is incapable of operation.

024 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a daily basis, the owner/operator shall removed caked and loose iron oxide material from exterior surfaces within the facility grounds. These surfaces include pipes, roofs, storage containers, and truck beds. The owner/operator shall visually inspect exterior surfaces within the facility grounds on a daily basis. The owner/operator shall immediately clean up any spills or build-up of iron oxide and keep exterior surfaces free of caked and loose iron oxide material. The clean-up and removal of this material shall be done in such a manner as to not cause the emission of fugitive air contaminants, as that term is defined in 25 Pa. Code Section 121.1.



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SECTION C. Site Level Requirements

025 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall inform and educate those responsible for maintenance of the facility, including the plant manager, supervisor(s), and maintenance workers, about the maintenance requirements specified in this operating permit. A copy of these requirements shall be posted in an accessible area so that management and maintenance personnel can review these requirements as needed.

VII. ADDITIONAL REQUIREMENTS.

026 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Should visible stack emissions, malodors, or visible fugitive emissions be observed, the owner/operator shall take immediate action to correct them. Should visible stack emissions be observed for a period longer than 72 hours, daily opacity observations of the stack shall be conducted by a person certified as a qualified observer for EPA Method 9 for Visual Determination of the Opacity of Emissions from Stationary Sources.

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

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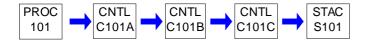




SECTION D. Source Level Requirements

Source ID: 101 Source Name: SPRAY ROASTER

Source Capacity/Throughput: 32.000 MMBTU/HR 8.200 Tons/HR



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this emission source in a manner that the concentration of particulate matter in the effluent gas exceeds the following:

(i) 0.04 grain per dry standard cubic foot, when the effluent gas volume is less than 150,000 dry standard cubic feet per minute.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Visible emissions from the spray roaster stack shall not equal or exceed 10 percent opacity.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The concentration of HCI emissions in the spray roaster stack shall not exceed the following:

- a. 25 ppmv
- b. 1.1 lbs/hr based on a 3-hr rolling average
- c. 4.8 tons/yr in any consecutive 12-month period

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The concentration of chlorine (CI2) emissions in the spray roaster stack shall not exceed the following:

- a. 6 ppmv
- b. 0.5 lbs/hr based on a 3-hr rolling average
- c. 2.2 tons/yr in any consecutive 12-month period

II. TESTING REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Testing shall be performed in accordance with the following provisions:

- (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

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SECTION D. Source Level Requirements

acceptance letter from the Department.

- (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/ecomm/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.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall perform US EPA method stack testing at a minimum of one time every five (5) years from the most recently approved stack test for hydrochloric acid, chlorine, and particulate matter emissions from this emission source.

III. MONITORING REQUIREMENTS.

007 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

Scrubber water shall be analyzed every two hours for free HCl and FeCl2. Results of these analyses shall be maintained and be made available to the Department at all times.







SECTION D. **Source Level Requirements**

RECORDKEEPING REQUIREMENTS.

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

REPORTING REQUIREMENTS.

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

VI. **WORK PRACTICE REQUIREMENTS.**

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

VII. ADDITIONAL REQUIREMENTS.

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

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SECTION D. Source Level Requirements

Source ID: 102 Source Name: IRON OXIDE STORAGE BIN A

Source Capacity/Throughput:

Conditions for this source occur in the following groups: G01



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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





SECTION D. Source Level Requirements

Source ID: 103 Source Name: IRON OXIDE STORAGE BIN B

Source Capacity/Throughput:

Conditions for this source occur in the following groups: G01



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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



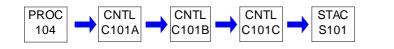


SECTION D. **Source Level Requirements**

Source ID: 104

Source Name: ACID TRUCK UNLOADING/LOADING STATION

Source Capacity/Throughput:



RESTRICTIONS.

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

II. **TESTING REQUIREMENTS.**

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

MONITORING REQUIREMENTS. III.

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

RECORDKEEPING REQUIREMENTS.

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

REPORTING REQUIREMENTS.

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

WORK PRACTICE REQUIREMENTS.

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

ADDITIONAL REQUIREMENTS.

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



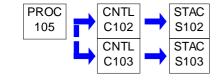




SECTION D. **Source Level Requirements**

Source ID: 105 Source Name: IRON OXIDE BAGGING/TRUCK LOADING

Source Capacity/Throughput:



RESTRICTIONS.

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

TESTING REQUIREMENTS.

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

MONITORING REQUIREMENTS. III.

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

RECORDKEEPING REQUIREMENTS.

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

REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The plastic curtain hanging from the garage door opening to the bulk truck iron oxide loading area shall be kept in place at all times and maintained in good condition to prevent the escape of fugitive dust from the building. The curtain shall be replaced if broken and/or if fugitive emissions are seen leaving the building.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

PVS Steel Services shall ensure that all iron oxide it stores outside is (a) stored in closed containers and (b) covered or packaged in a manner which will prevent wind or precipitation dispersal and moisture incursion (such as waterproof coverings). Nothing herein shall alter PVS Steel Services obligation to comply with the requirements of 25 Pa Code Sections 123.1 and 123.2, any other applicable regulatory or permit requirement, or the requirements of any prior Department Orders and Consent Orders and Agreements which may be in force.





SECTION D. Source Level Requirements

VII. ADDITIONAL REQUIREMENTS.

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

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W. S. W.

SECTION D. Source Level Requirements

Source ID: 108 Source Name: 8 WPL/HCL STORAGE TANKS

Source Capacity/Throughput:



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The owner/operator of an affected hydrochloric acid storage vessel shall inspect each vessel semiannually to determine that the closed-vent system and either the air pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The owner/operator shall maintain records of semiannual storage tank inspections. Records shall include the following:

- 1. Date
- 2. Time
- 3. Name of inspector
- 4. Condition of tanks, closed-vent system, piping, and other essential components.

Records shall be maintained for a period of five (5) years from the date of inspection and be made available to the Department upon request.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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



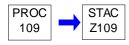




SECTION D. Source Level Requirements

Source ID: 109 Source Name: PLANT PAVED ROADS & SURFACES

Source Capacity/Throughput:



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

On a daily basis, the owner/operator shall removed caked and loose iron oxide material from plant roadways and from on the ground in and around the building where trucks are bulk loaded with iron oxide. The owner/operator shall immediately clean up any spills or build-up of iron oxide, keep the plant roadways and grounds free of caked and loose iron oxide material using a vacuum sweeper on a daily basis (weather permitting), and prevent the track-out of iron oxide dust due to vehicle traffic. The clean-up and removal of this material shall be done in such a manner as to not cause the emission of fugitive air contaminants, as that term is defined in 25 Pa. Code Section 121.1.

VII. ADDITIONAL REQUIREMENTS.

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





SECTION D. **Source Level Requirements**

Source ID: 110 Source Name: RAILCAR UNLOADING

Source Capacity/Throughput:



RESTRICTIONS.

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

II. **TESTING REQUIREMENTS.**

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

MONITORING REQUIREMENTS. III.

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

RECORDKEEPING REQUIREMENTS.

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

REPORTING REQUIREMENTS.

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

WORK PRACTICE REQUIREMENTS. VI.

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

VII. ADDITIONAL REQUIREMENTS.

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



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SECTION E. Source Group Restrictions.

Group Name: G01

Group Description: Iron Oxide Storage Bins

Sources included in this group

IE)	Name
10)2	IRON OXIDE STORAGE BIN A
10)3	IRON OXIDE STORAGE BIN B

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Particulate matter emissions from the iron oxide storage bin baghouse stacks shall not exceed 0.02 gr/dscf.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Visible emissions from the iron oxide storage bin baghouse stacks shall not equal or exceed 10 percent opacity.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The owner/operator shall thoroughly inspect the inside of each fabric collector and the components therein at least once every 30 days with the Visolite system or another method approved in writing by the Department to insure that each of the fabric collectors is working properly and is in a good state of repair. If a problem with a fabric collector is found that is or may be causing the release of iron oxide in excess of the standards, the owner/operator shall put the fabric collector out of service until it has been properly repaired. At no time shall an air contamination source be operated without its requisite air pollution control device.

IV. RECORDKEEPING REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Records of monthly fabric collector inspections shall be maintained either in a permanently bound logbook or electronically and shall be made available to the Department at all times. The records shall contain the following information at a minimum:

- 1. Date
- 2. Time
- 3. Name of inspector
- 4. Condition of bags and other internal fabric collector components
- 5. Pressure drop across the fabric collector
- 6. Maintenance or repairs performed, if any
- 7. Nature of the maintenance done or repairs made, if any
- 8. Name of the performing technician, if applicable

Records shall be maintained for a minimum period of five (5) years from the date of inspection and shall be made available to the Department upon request.





SECTION E. Source Group Restrictions.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

A spare set of at least 25% of the required bags for one of the iron oxide storage bin baghouses shall be kept on site at all times.

VII. ADDITIONAL REQUIREMENTS.

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

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SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

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SECTION G. Emission Restriction Summary.

Source Id	Source Description	
101	SPRAY ROASTER	
Emission Limit		Pollutant
0.500	Lbs/Hr	Chlorine
2.200	Tons/Yr	Chlorine
6.000	PPMV	Chlorine
1.100	Lbs/Hr	Hydrochloric Acid
4.800	Tons/Yr	Hydrochloric Acid
25.000	PPMV	Hydrochloric Acid

Site Emission Restriction Summary

Emission Limit	Pollutant

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SECTION H. Miscellaneous.



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