



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: March 11, 2020 Effective Date: January 17, 2025
Revision Date: January 17, 2025
Expiration Date: March 11, 2025

Revision Type: Modification

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

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

TITLE V Permit No: 63-00027

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

Owner Information

Name: JESSOP STEEL LLC
Mailing Address: 100 RIVER RD

BRACKENRIDGE, PA 15014-1537

Plant Information

Plant: JESSOP STEEL LLC/WASHINGTON PLT

Location: 63 Washington County 63003 Washington City

SIC Code: 3316 Manufacturing - Cold Finishing Of Steel Shapes

Responsible Official

Name: DEBORAH CALDERAZZO

Title: DIR ENV AFFAIRS

Phone: (724) 226 - 5947 Email: Deborah.Calderazzo@ATlmaterials.com

Permit Contact Person

Name: DEBORAH L CALDERAZZO

Title: DIR ENV AFFAIRS

Phone: (724) 226 - 5947 Email: Deborah.Calderazzo@ATlmaterials.com

[Signature] _____

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



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SECTION A. Site Inventory List

Source I	D Source Name	Capacity/	Throughput	Fuel/Material
031	MIURA BOILERS 1& 2 RATED AT 3.94 MMBTU/ HR	3.940	MMBTU/HR	
	EACH	3.860	MCF/HR	Natural Gas
220	MISC SPACE HEATERS	1.000	Th Gal/HR	#2 Oil
		1.000	MMCF/HR	
102	SHOT-BLAST		Tons/HR	
		15.000	Tons/HR	
110	110" MILL HEATING FURNACES 1-7	25.000	Tons/HR	
126	PICKLING DEPT	15.000	Tons/HR	
127	PRODUCTION BURNING	14.000	Tons/HR	
		14.000	Tons/HR	
130	GRINDING MACHINES 1 & 2	25.000	Tons/HR	
140 BAR MILL ANNEALING	BAR MILL ANNEALING FURNACES 3, 4, 5, 7-17	20.000	Tons/HR	
		3.000	MMCF/HR	
160	D.W.S.L. 400" ANNEALING FURNACE	12.000	Tons/HR	
			N/A	
170 PARTS CLEANERS	PARTS CLEANERS		N/A	
			N/A	
180 OLSON 110" MILL	OLSON 110" MILL REHEAT FURNACE (# 8)	10.000	Tons/HR	
			N/A	
181 LOI 110" MILL REHEAT FURI	LOI 110" MILL REHEAT FURNACE (# 9)	26.100	MMBTU/HR	
			N/A	
			N/A	
		58.250	MCF/HR	
210	COOLING TOWERS	180.000	Gal/HR	
230	VEHICLE TRAVEL (PAVED ROADS)	30.000	Miles/HR	
			N/A	
260 HYBRID ANNEAL FURNAC	HYBRID ANNEAL FURNACE	34.800	MMBTU/HR	
			N/A	
C102	SHOTBLAST DUSTCOLLECTOR (11,100 ACFM)			
C127	POWDER BURNING BENCH BAGHOUSE (35,000)			
C130A	GRINDING BENCH 1 BAGHOUSE (50,000 ACFM)			
C130B	GRINDING BENCH 2 BAGHOUSE (50,000ACFM)			
S031	BOILERS STACK			
S102	SHOTBLAST			
S110A	STACK			
S110B	STACK			
S110C	STACK			
S110D	STACK			
S110E	STACK			
S110F	STACK			
S110G	STACK			

DEP Auth ID: 1456523

DEP PF ID: 278317

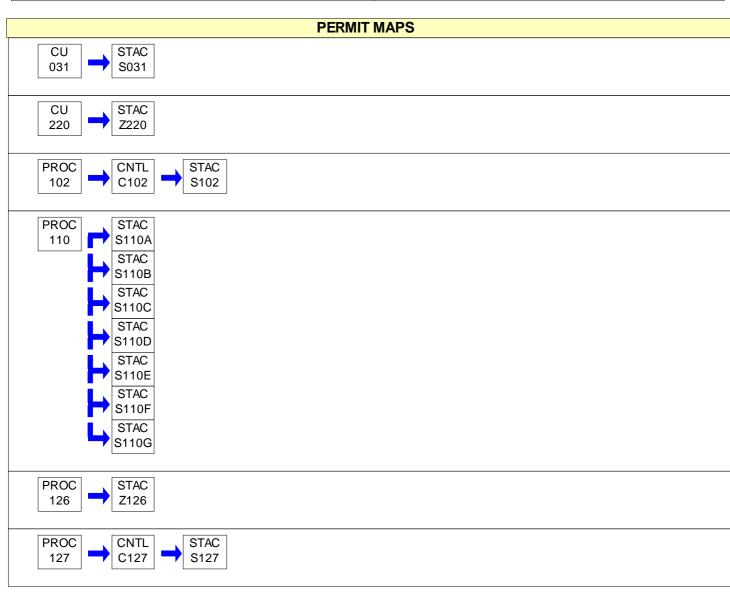
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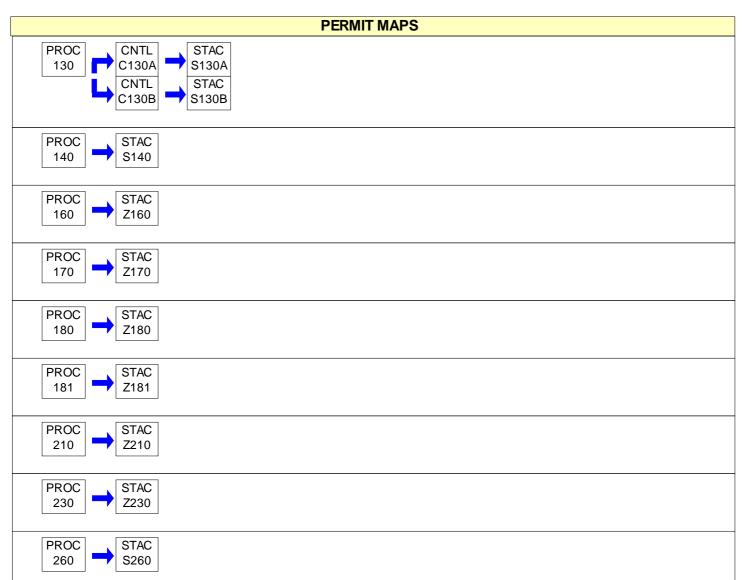
SECTION A. Site Inventory List

Source I	D Source Name	Capacity/Throughput	Fuel/Material
S127	POWDER BURNING BENCHES(3)		
S130A	NO.1 GRINDER		
S130B	NO.2 GRINDER		
S140	BAR MILL FURNACES		
S260	STACK		
Z126	EXHAUST		
Z160	EXHAUST		
Z170	EXHAUST		
Z180	EXHAUST		
Z181	EXHAUST		
Z210	EXHAUST		
Z220	SPACE HEATERS		
Z230	EXHAUST		













#001 [25 Pa. Code § 121.1]

Definitions

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

#002 [25 Pa. Code § 121.7]

Prohibition of Air Pollution

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

#003 [25 Pa. Code § 127.512(c)(4)]

Property Rights

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

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

Permit Expiration

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

#005 [25 Pa. Code §§ 127.412, 127.413, 127.414, 127.446(e), 127.503 & 127.704(b)]

Permit Renewal

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

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

Transfer of Ownership or Operational Control

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





the Department.

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

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

Inspection and Entry

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

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

Compliance Requirements

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

#009 [25 Pa. Code § 127.512(c)(2)]

Need to Halt or Reduce Activity Not a Defense

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



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

Duty to Provide Information

63-00027

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

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

Reopening and Revising the Title V Permit for Cause

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

#012 [25 Pa. Code § 127.543]

Reopening a Title V Permit for Cause by EPA

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

#013 [25 Pa. Code § 127.522(a)]

Operating Permit Application Review by the EPA

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

R3_Air_Apps_and_Notices@epa.gov

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





#014 [25 Pa. Code § 127.541]

Significant Operating Permit Modifications

When permit modifications during the term of this permit do not qualify as minor permit modifications or administrative amendments, the permittee shall submit an application for significant Title V permit modifications in accordance with 25 Pa. Code § 127.541. Notifications to EPA, pursuant to 25 PA Code §127.522(a), if required, shall be submitted, to the following EPA e-mail box:

R3_Air_Apps_and_Notices@epa.gov

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

#015 [25 Pa. Code §§ 121.1 & 127.462]

Minor Operating Permit Modifications

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

R3_Air_Apps_and_Notices@epa.gov

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

#016 [25 Pa. Code § 127.450]

Administrative Operating Permit Amendments

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

R3_Air_Apps_and_Notices@epa.gov

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

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

#017 [25 Pa. Code § 127.512(b)]

Severability Clause

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

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

Fee Payment

- (a) The permittee shall pay fees to the Department in accordance with the applicable fee schedules in 25 Pa. Code Chapter 127, Subchapter I (relating to plan approval and operating permit fees). The applicable fees shall be made payable to "The Commonwealth of Pennsylvania Clean Air Fund" with the permit number clearly indicated and submitted to the respective regional office.
- (b) Emission Fees. The permittee shall, on or before September 1st of each year, pay applicable annual Title V emission fees for emissions occurring in the previous calendar year as specified in 25 Pa. Code § 127.705. The permittee is not required to pay an emission fee for emissions of more than 4,000 tons of each regulated pollutant emitted from the facility.
- (c) As used in this permit condition, the term "regulated pollutant" is defined as a VOC, each pollutant regulated under Sections 111 and 112 of the Clean Air Act and each pollutant for which a National Ambient Air Quality Standard has been promulgated, except that carbon monoxide is excluded.



- (d) Late Payment. Late payment of emission fees will subject the permittee to the penalties prescribed in 25 Pa. Code § 127.707 and may result in the suspension or termination of the Title V permit. The permittee shall pay a penalty of fifty percent (50%) of the fee amount, plus interest on the fee amount computed in accordance with 26 U.S.C.A. § 6621(a)(2) from the date the emission fee should have been paid in accordance with the time frame specified in 25 Pa. Code § 127.705(c).
- (e) The permittee shall pay an annual operating permit maintenance fee according to the following fee schedule established in 25 Pa. Code § 127.704(d) on or before December 31 of each year for the next calendar year.
- (1) Eight thousand dollars (\$8,000) for calendar years 2021—2025.
- (2) Ten thousand dollars (\$10,000) for calendar years 2026—2030.
- (3) Twelve thousand five hundred dollars (\$12,500) for the calendar years beginning with 2031.

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

Authorization for De Minimis Emission Increases

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

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

- (b) Except as provided below in (c) and (d) of this permit condition, the permittee is authorized during the term of this permit to make de minimis emission increases (expressed in tons per year) up to the following amounts without the need for a plan approval or prior issuance of a permit modification:
- (1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.
- (2) One ton of NOx from a single source during the term of the permit and 5 tons of NOx at the facility during the term of the permit.
- (3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.
- (4) Six-tenths of a ton of PM10 from a single source during the term of the permit and 3.0 tons of PM10 at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act or 25 Pa. Code Article III.
- (c) In accordance with § 127.14, the permittee may install the following minor sources without the need for a plan approval:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
 - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.





- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility, liquefied petroleum gas or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code § 123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (b)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (4) Changes which are modifications under any provision of Title I of the Clean Air Act and emission increases which would exceed the allowable emissions level (expressed as a rate of emissions or in terms of total emissions) under the Title V permit.
- (e) Unless precluded by the Clean Air Act or the regulations thereunder, the permit shield described in 25 Pa. Code § 127.516 (relating to permit shield) shall extend to the changes made under 25 Pa. Code § 127.449 (relating to de minimis emission increases).
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases allowed under this permit, 25 Pa. Code § 127.449, or sources and physical changes meeting the requirements of 25 Pa. Code § 127.14, the permittee is prohibited from making physical changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

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

Reactivation of Sources

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

#021 [25 Pa. Code §§ 121.9 & 127.216]

Circumvention

(a) The owner of this Title V facility, or any other person, may not circumvent the new source review requirements of 25 Pa. Code Chapter 127, Subchapter E by causing or allowing a pattern of ownership or development, including the





phasing, staging, delaying or engaging in incremental construction, over a geographic area of a facility which, except for the pattern of ownership or development, would otherwise require a permit or submission of a plan approval application.

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

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

Submissions

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

Regional Air Program Manager

PA Department of Environmental Protection

(At the address given on the permit transmittal letter, or otherwise notified)

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

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

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

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

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

Sampling, Testing and Monitoring Procedures

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

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

Recordkeeping Requirements

- (a) The permittee shall maintain and make available, upon request by the Department, records of required monitoring information that include the following:
 - (1) The date, place (as defined in the permit) and time of sampling or measurements.
 - (2) The dates the analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.





- (5) The results of the analyses.
- (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of the required monitoring data and supporting information for at least five (5) years from the date of the monitoring sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

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

Reporting Requirements

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

#026 [25 Pa. Code § 127.513]

Compliance Certification

- (a) One year after the date of issuance of the Title V permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emission limitations, standards or work practices. This certification shall include:
- (1) The identification of each term or condition of the permit that is the basis of the certification.
- (2) The compliance status.
- (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
- (4) Whether compliance was continuous or intermittent.
- (b) The compliance certification shall be postmarked or hand-delivered no later than thirty days after each anniversary of the date of issuance of this Title V Operating Permit, or on the submittal date specified elsewhere in the permit, to the Department in accordance with the submission requirements specified in Section B, Condition #022 of this permit. The Title V compliance certification shall be emailed to EPA at R3_APD_Permits@epa.gov.





#027 [25 Pa. Code § 127.3]

Operational Flexibility

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

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

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

Risk Management

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





- (e) If the Title V facility is subject to 40 CFR Part 68, the permittee shall maintain records supporting the implementation of an accidental release program for five (5) years in accordance with 40 CFR § 68.200.
- (f) When the Title V facility is subject to the accidental release program requirements of Section 112(r) of the Clean Air Act and 40 CFR Part 68, appropriate enforcement action will be taken by the Department if:
- (1) The permittee fails to register and submit the RMP or a revised plan pursuant to 40 CFR Part 68.
- (2) The permittee fails to submit a compliance schedule or include a statement in the compliance certification required under Section B, Condition #026 of this permit that the Title V facility is in compliance with the requirements of Section 112(r) of the Clean Air Act, 40 CFR Part 68, and 25 Pa. Code § 127.512(i).

#029 [25 Pa. Code § 127.512(e)]

Approved Economic Incentives and Emission Trading Programs

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

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

Permit Shield

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

#031 [25 Pa. Code §135.3]

Reporting

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

#032 [25 Pa. Code §135.4]

Report Format

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





SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §121.7]

Prohibition of air pollution.

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) (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) Not applicable.

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 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions) if such 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

- (a) Not applicable.
- (b) A person may not permit the emission into the outdoor atmosphere of any malodorous air contaminants from any source in such a manner that the malodors are detectable outside the property of the person on whose land the source is being operated.
- (c) Not applicable.

005 [25 Pa. Code §123.41]

Limitations

A person may 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 limitations of 123.41 (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.
- (3) When the emission results from sources specified in 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).
- (4) Not applicable.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

110 - 110" Mill Heating Furnaces 1-7

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

140 - Bar Mill Annealing Furnaces

160 - 400" D.W. Annealing Furnace

150 - 400" S.W. Annealing Furnace

126 - Batch pickling.

009 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

110 - 110" Mill Heating Furnaces 1-7





SECTION C. **Site Level Requirements**

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

140 - Bar Mill Annealing Furnaces

160 - 400" D.W. Annealing Furnace

150 - 400" S.W. Annealing Furnace

126 - Batch pickling.

010 [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.

011 [25 Pa. Code §129.14]

Open burning operations

- (a) Air basins. Not applicable.
- (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.
 - (d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:





SECTION C. Site Level Requirements

(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.

012 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall submit one electronic copy of a pre-test protocol to the Department for review at least 90 days prior to the performance of any EPA reference method stack test. The permittee shall submit one electronic copy of a one-time protocol to the Department for review for the use of a portable analyzer and may repeat portable analyzer testing without additional protocol approvals provided that the same method and equipment are used. All proposed performance test methods shall be identified in the pre-test protocol and approved by the Department prior to testing.

The Department Source Testing Manual is available at this web address: http://www.depgreenport.state.pa.us/elibrary/GetFolder?FolderID=4563

- (a) At least 90 calendar days prior to commencing an emissions testing program, a test protocol shall be submitted to the Department for review and approval in accordance with paragraph (8) of this condition. The test protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- (b) When testing of a source is required on a recurring basis, a single procedural protocol may be submitted for approval;





SECTION C. Site Level Requirements

thereafter, a letter, submitted at least 90 calendar days prior to commencing an emissions testing program, referencing the previously approved procedural protocol is sufficient if the letter is approved by the Department. The letter shall be submitted as required in paragraph (a). If modifications are made to the process(es), if a different stack testing company is used, or if an applicable section of the stack test manual has been revised since the approval, a new protocol shall be submitted for approval.

- (c) 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 Department in accordance with paragraph (h) of this condition. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.
- (d) If the proposed testing did not occur per the required notification in paragraph (b) above, an electronic mail notification shall be sent within 15 calendar days after the expected completion date of the onsite testing to the Department, in accordance with paragraph (h) of this condition, indicating why the proposed completion date of the on-site testing was not adhered to.
- (e) A complete test report shall be submitted to the Department no later than 60 calendar days after completion of the onsite testing portion of an emission test program.
- (1) The test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions.
 - (2) The summary results will include, at a minimum, the following information:
- (A) A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
 - (B) Permit number(s) and condition(s) which are the basis for the evaluation.
 - (C) Summary of results with respect to each applicable permit condition.
 - (D) Statement of compliance or non-compliance with each applicable permit condition.
- (f) Pursuant to 25 Pa. Code § 139.3, 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 §§ 139.53(a)(1) and 139.53(a)(3):
- (1) All submittals, except test notifications & portable emission monitor tests, shall be accomplished through PSIMS*Online, available through https://www.depgreenport.state.pa.us/ecomm/Login.jsp, if it is available.
- (2) For test notifications & portable analyzer results, or if internet submittal cannot be accomplished, one electronic copy of the test submission (notifications, protocols, reports, supplemental information, etc.) shall be sent to both PSIMS Administration in Central Office and to the Regional Office AQ Program Manager at the following addresses.

CENTRAL OFFICE:

RA-EPstacktesting@pa.gov

SOUTHWEST REGIONAL OFFICE:

RA-EPSWstacktesting@pa.gov

(i) The permittee shall ensure 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





SECTION C. **Site Level Requirements**

default.

- (j) Actions Related to Noncompliance Demonstrated by a Stack Test:
- (1) If the results of a stack test, performed as required by this approval, exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. Within 30 days of the Permittee receiving the stack test results, a written description of the corrective actions shall be submitted to the Department. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. The Department shall notify the Permittee within 30 days, if the corrective actions taken are deficient. Within 30 days of receipt of the notice of deficiency, the Permittee shall submit a description of additional corrective actions to the Department. The Department reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (2) If the results of the required stack test exceed any limit defined in this permit, the test was not performed in accordance with the stack test protocol or the source and/or air cleaning device was not operated in accordance with the permit, then another stack test shall be performed to determine compliance. Within 120 days of the Permittee receiving the original stack test results, a retest shall be performed. The Department may extend the retesting deadline if the Permittee demonstrates, to the Department's satisfaction, that retesting within 120 days is not practicable. Failure of the second test to demonstrate compliance with the limits in the permit, not performing the test in accordance with the stack test protocol or not operating the source and/or air cleaning device in accordance with the permit may be grounds for immediate revocation of the permit to operate the affected source.

III. MONITORING REQUIREMENTS.

013 [25 Pa. Code §123.43]

Measuring techniques

Visible emissions may be measured using either of the following:

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

014 [25 Pa. Code §127.441]

Operating permit terms and conditions.

A facility-wide inspection shall be conducted at a minimum of once per day when the facility is operated by the Owner/Operator. The facility-wide inspection shall be conducted for the presence of the following:

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

These observations are to ensure continued compliance with source-specific visible emission limitations, fugitive emissions prohibited under 25 Pa. Code §123.1 or §123.2, and potentially objectionable odors prohibited under 25 Pa. Code §123.31. Observations for visible stack emissions shall be conducted during daylight hours and all observations shall be conducted while the sources are in operation. If any visible stack emissions, fugitive emissions, or potentially objectionable odors are apparent, the Owner/Operator shall take corrective action.

If any visible emissions are apparent after the corrective action, sources of emissions shall not start until the permittee can verify compliance with the opacity standards specified in the permit through methods prescribed in §123.43, such as Method 9 readings taken by a certified visible emissions reader.





SECTION C. Site Level Requirements

IV. RECORDKEEPING REQUIREMENTS.

015 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Records of each inspection for visible stack, fugitive, and potentially objectionable odors shall be maintained in a log and at a minimum include the date, time, name and title of the observer, along with any corrective action taken as a result.

016 [25 Pa. Code §127.441]

Operating permit terms and conditions.

All logs and required records shall be maintained on site or at an alternative location acceptable to the Department for a minimum of five years and shall be made available to the Department upon request.

017 [25 Pa. Code §129.95]

Recordkeeping

In accordance with RACT Operating Permit 63-000-027, Condition No. 10, the Owner/Operator shall maintain records in accordance with 25 Pa. Code §129.95.

At a minimum, the following records shall be kept at the facility:

- · Monthly natural gas consumption; and
- · Steel production.

These records shall be maintained on file for not less than five years and shall be made available to the Department upon request.

018 [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 §135.3 and §135.21 (relating to reporting; and emission statements). These may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions. If direct recordkeeping is not possible or practical, sufficient records shall be kept to provide the needed information by indirect means.

V. REPORTING REQUIREMENTS.

019 [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) A person who receives initial notification by the Department that a source report is necessary shall submit an initial source report within 60 days after receiving the notification or by March 1 of the year following the year for which the report is required, whichever is later.
- (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.

020 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

(c) A person responsible for any source specified in subsections (a)(1) -- (7) or (9) shall take all reasonable actions to







SECTION C. Site Level Requirements

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.

VII. ADDITIONAL REQUIREMENTS.

021 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

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).

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IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

*** Permit Shield In Effect ***

DEP Auth ID: 1456523 DEP PF ID: 278317



63-00027



SECTION D. Source Level Requirements

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

Source Capacity/Throughput: 3.940 MMBTU/HR

3.860 MCF/HR Natural Gas

CU 031 STAC S031

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.11]

Combustion units

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

002 [25 Pa. Code §123.22]

Combustion units

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

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

003 [25 Pa. Code §129.93]

Presumptive RACT emission limitations

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.





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

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. ***





Source ID: 220 Source Name: MISC SPACE HEATERS

Source Capacity/Throughput: 1.000 Th Gal/HR #2 Oil

1.000 MMCF/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.

001 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

003 [25 Pa. Code §129.115]

Written notification, compliance demonstration and recordkeeping and reporting requirements

- (a) (e) Not applicable.
- (f) The owner and operator of an air contamination source subject to this section and §129.111—§129.114 shall keep records to demonstrate compliance with §129.111—§129.114 and submit reports to the Department or appropriate approved local air pollution control agency in accordance with the applicable regulations in 25 Pa. Code, Part I, Subpart C, Article III (relating to air resources) and as specified in the operating permit or plan approval for the air contamination source as follows:
- (1) The records shall include sufficient data and calculations to demonstrate that the requirements of §129.111—§129.114 are met.
- (2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
- (3) The records necessary to determine compliance shall be reported to the Department or appropriate approved local air pollution control agency on a schedule specified in the applicable regulation or as otherwise specified in the operating permit or plan approval for the air contamination source.
- (g) (j) Not applicable.





(k) The records shall be retained by the owner or operator for 5 years and made available to the Department or appropriate approved local air pollution control agency upon receipt of a written request from the Department or appropriate approved local air pollution control agency.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §129.112]

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

- (c) The owner and operator of a source listed in this subsection that is located at a major NOx emitting facility or major VOC emitting facility subject to §129.111 shall install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices:
 - (1) (3) Not applicable.
 - (4) A boiler or other combustion source with an individual rated gross heat input less than 20 million Btu/hour.
 - (5) (9) Not applicable.
- (d) (q) Not applicable.

005 [25 Pa. Code §129.93]

Presumptive RACT emission limitations

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



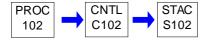


Source ID: 102 Source Name: SHOT-BLAST

Source Capacity/Throughput: 20.000 Tons/HR

15.000 Tons/HR

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



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

Applicability

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

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

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

(b) Indicator Range:

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

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





(vi) Averaging Period: Not applicable.

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

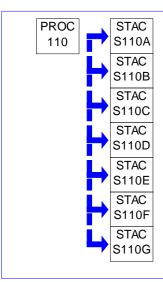


Source ID: 110 Source Name: 110" MILL HEATING FURNACES 1-7

Source Capacity/Throughput: 25.000 Tons/HR

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

NOX RACT LIMITS
PRESUMPTIVE RACT II



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

001 [25 Pa. Code §129.115]

Written notification, compliance demonstration and recordkeeping and reporting requirements

- (a) (e) Not applicable.
- (f) The owner and operator of an air contamination source subject to this section and §129.111—§129.114 shall keep records to demonstrate compliance with §129.111—§129.114 and submit reports to the Department or appropriate approved local air pollution control agency in accordance with the applicable regulations in 25 Pa. Code, Part I, Subpart C, Article III (relating to air resources) and as specified in the operating permit or plan approval for the air contamination source as follows:
- (1) The records shall include sufficient data and calculations to demonstrate that the requirements of §129.111—§129.114 are met.
- (2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.



- (3) The records necessary to determine compliance shall be reported to the Department or appropriate approved local air pollution control agency on a schedule specified in the applicable regulation or as otherwise specified in the operating permit or plan approval for the air contamination source.
- (g) (j) Not applicable.
- (k) The records shall be retained by the owner or operator for 5 years and made available to the Department or appropriate approved local air pollution control agency upon receipt of a written request from the Department or appropriate approved local air pollution control agency.

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.

002 [25 Pa. Code §129.112]

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

- (a) The owner and operator of a source listed in one or more of subsections (b)—(k) located at a major NOx emitting facility or major VOC emitting facility subject to §129.111 (relating to applicability) shall comply with the applicable presumptive RACT requirement or RACT emission limitation, or both, beginning with the specified compliance date as follows, unless an alternative compliance schedule is submitted and approved under subsections (n)—(p) or §129.114 (relating to alternative RACT proposal and petition for alternative compliance schedule):
 - (1) January 1, 2023, for a source subject to §129.111(a).
 - (2) Not applicable.
- (b) Not applicable.
- (c) The owner and operator of a source listed in this subsection that is located at a major NOx emitting facility or major VOC emitting facility subject to §129.111 shall install, maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices:
 - (1) (3) Not applicable.
 - (4) A boiler or other combustion source with an individual rated gross heat input less than 20 million Btu/hour.
 - (5) (9) Not applicable.
- (d) (q) Not applicable.

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. ***



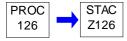




Source ID: 126 Source Name: PICKLING DEPT

> Source Capacity/Throughput: 15.000 Tons/HR

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



63-00027

RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

II. TESTING REQUIREMENTS.

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

MONITORING REQUIREMENTS. Ш

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

[25 Pa. Code §129.115]

Written notification, compliance demonstration and recordkeeping and reporting requirements

- (a) (e) Not applicable.
- (f) The owner and operator of an air contamination source subject to this section and §129.111—§129.114 shall keep records to demonstrate compliance with §129.111—§129.114 and submit reports to the Department or appropriate approved local air pollution control agency in accordance with the applicable regulations in 25 Pa. Code, Part I, Subpart C, Article III (relating to air resources) and as specified in the operating permit or plan approval for the air contamination source as follows:
- (1) The records shall include sufficient data and calculations to demonstrate that the requirements of §129.111—§129.114 are met.
- (2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
- (3) The records necessary to determine compliance shall be reported to the Department or appropriate approved local air pollution control agency on a schedule specified in the applicable regulation or as otherwise specified in the operating permit or plan approval for the air contamination source.
- (g) (j) Not applicable.



(k) The records shall be retained by the owner or operator for 5 years and made available to the Department or appropriate approved local air pollution control agency upon receipt of a written request from the Department or appropriate approved local air pollution control agency.

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §129.112]

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

- a) The owner and operator of a source listed in one or more of subsections (b)—(k) located at a major NOx emitting facility or major VOC emitting facility subject to §129.111 (relating to applicability) shall comply with the applicable presumptive RACT requirement or RACT emission limitation, or both, beginning with the specified compliance date as follows, unless an alternative compliance schedule is submitted and approved under subsections (n)—(p) or §129.114 (relating to alternative RACT proposal and petition for alternative compliance schedule):
 - (1) January 1, 2023, for a source subject to §129.111(a).
 - (2) Not applicable.
- (b) Not applicable.
- (c) The owner and operator of a source listed in this subsection that is located at a major NOx emitting facility or major VOC emitting facility subject to §129.111 shall install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices:
 - (1) A NOx air contamination source that has the potential to emit less than 5 TPY of NOx.
 - (2) (9) Not applicable.
- (d) (q) Not applicable.

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. ***

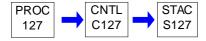


Source ID: 127 Source Name: PRODUCTION BURNING

Source Capacity/Throughput: 14.000 Tons/HR

14.000 Tons/HR

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



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

Applicability

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

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

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

(b) Indicator Range:

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

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





IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

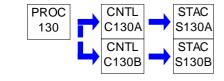




Source ID: 130 Source Name: GRINDING MACHINES 1 & 2

Source Capacity/Throughput: 25.000 Tons/HR

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



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

Applicability

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

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

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

(b) Indicator Range:

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

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





IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



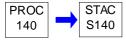


Source ID: 140 Source Name: BAR MILL ANNEALING FURNACES 3, 4, 5, 7-17

Source Capacity/Throughput: 20.000 Tons/HR

3.000 MMCF/HR

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



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

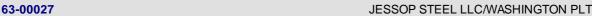
Operating permit terms and conditions.

The company shall maintain records of NOx and VOC emissions from these combined furnaces and shall keep for a minimum of five (5) years.

004 [25 Pa. Code §129.115]

Written notification, compliance demonstration and recordkeeping and reporting requirements

- (a) (e) Not applicable.
- (f) The owner and operator of an air contamination source subject to this section and §129.111—§129.114 shall keep records to demonstrate compliance with §129.111—§129.114 and submit reports to the Department or appropriate approved local air pollution control agency in accordance with the applicable regulations in 25 Pa. Code, Part I, Subpart C, Article III (relating to air resources) and as specified in the operating permit or plan approval for the air contamination source as follows:
- (1) The records shall include sufficient data and calculations to demonstrate that the requirements of §129.111—§129.114 are met.
- (2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with





the averaging period of the requirement.

- (3) The records necessary to determine compliance shall be reported to the Department or appropriate approved local air pollution control agency on a schedule specified in the applicable regulation or as otherwise specified in the operating permit or plan approval for the air contamination source.
- (g) (j) Not applicable.
- (k) The records shall be retained by the owner or operator for 5 years and made available to the Department or appropriate approved local air pollution control agency upon receipt of a written request from the Department or appropriate approved local air pollution control agency.

REPORTING REQUIREMENTS.

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

WORK PRACTICE REQUIREMENTS.

005 [25 Pa. Code §129.112]

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

- (a) The owner and operator of a source listed in one or more of subsections (b)—(k) located at a major NOx emitting facility or major VOC emitting facility subject to §129.111 (relating to applicability) shall comply with the applicable presumptive RACT requirement or RACT emission limitation, or both, beginning with the specified compliance date as follows, unless an alternative compliance schedule is submitted and approved under subsections (n)—(p) or §129.114 (relating to alternative RACT proposal and petition for alternative compliance schedule):
 - (1) January 1, 2023, for a source subject to §129.111(a).
 - (2) Not applicable.
- (b) Not applicable.
- (c) The owner and operator of a source listed in this subsection that is located at a major NOx emitting facility or major VOC emitting facility subject to §129.111 shall install, maintain and operate the source in accordance with the manufacturer's specifications and with good operating practices:
 - (1) (3) Not applicable.
 - (4) A boiler or other combustion source with an individual rated gross heat input less than 20 million Btu/hour.
 - (5) (9) Not applicable.
- (d) (q) Not applicable.

006 [25 Pa. Code §129.93]

Presumptive RACT emission limitations

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







VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***





JESSOP STEEL LLC/WASHINGTON PLT

SECTION D. **Source Level Requirements**

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

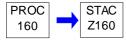
> Source Capacity/Throughput: 12.000 Tons/HR

> > N/A

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

FURNACES= 20 MM<50MM

RACTII



63-00027

RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

TESTING REQUIREMENTS. II.

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

MONITORING REQUIREMENTS. III.

003 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The permittee shall conduct periodic monitoring for NOx and CO emissions from the furnace at a minimum of semiannually (twice per calendar year) but no sooner than three (3) calendar months from the date of the previous test. A Department-approved performance (stack) test that has been performed within six calendar months prior to the scheduled periodic monitoring may be used in lieu of the periodic monitoring for that time period. A portable gas analyzer may be used to satisfy the requirements of this condition utilizing three test runs of twenty (20) minutes for each test run. The Department may alter the frequency of portable analyzer tests based on the test results. The frequency of portable gas analyzer tests may be altered only with the Department's prior written approval. The portable gas analyzer shall be used and maintained according to the manufacturer's specifications and the procedures specified in ASTM D6522 or equivalent procedures, as approved by the Department. The permittee may repeat portable analyzer testing without additional protocol approvals provided that the same method and equipment are used.

004 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall install, operate, and maintain a gas flow meter on the fuel supply to this furnace.

RECORDKEEPING REQUIREMENTS. IV.

005 [25 Pa. Code §127.441]

Operating permit terms and conditions.





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

006 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall record each tune-up and adjustment conducted. This record must contain, at a minimum:

- (1) The date of the tuning procedure.
- (2) The name of the service company and the technician performing the procedure.
- (3) The final operating rate or load.
- (4) The final NOx and CO emission rates.
- (5) The final excess oxygen rate.
- (6) Other information required by the applicable operating permit.

007 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The permittee shall maintain the following comprehensive and accurate records for this source:

- The total natural gas consumption to each furnace (in MMscf/yr or equivalent) on a 12-month rolling basis.
- The hours of operation of each furnace on a 12-month rolling basis.
- Records of any periodic monitoring (portable analyzer) results conducted.

008 [25 Pa. Code §129.115]

Written notification, compliance demonstration and recordkeeping and reporting requirements

- (a) (e) Not applicable.
- (f) The owner and operator of an air contamination source subject to this section and §129.111—§129.114 shall keep records to demonstrate compliance with §129.111—§129.114 and submit reports to the Department or appropriate approved local air pollution control agency in accordance with the applicable regulations in 25 Pa. Code, Part I, Subpart C, Article III (relating to air resources) and as specified in the operating permit or plan approval for the air contamination source as follows:
- (1) The records shall include sufficient data and calculations to demonstrate that the requirements of §129.111—§129.114 are met.
- (2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
- (3) The records necessary to determine compliance shall be reported to the Department or appropriate approved local air pollution control agency on a schedule specified in the applicable regulation or as otherwise specified in the operating permit or plan approval for the air contamination source.
- (g) (j) Not applicable.
- (k) The records shall be retained by the owner or operator for 5 years and made available to the Department or appropriate approved local air pollution control agency upon receipt of a written request from the Department or appropriate approved local air pollution control agency.

V. REPORTING REQUIREMENTS.

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





VI. WORK PRACTICE REQUIREMENTS.

009 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall conduct an annual tune-up in accordance with the procedures in 40 CFR 63.11223 (relating to how do I demonstrate continuous compliance with the work practice and management practice standards?).

- (A) Each annual tune-up shall occur not less than 3 months and not more than 12 months after the date of the previous tune-up.
 - (B) The annual tune-up must include, at a minimum, the following:
- (I) Inspection and cleaning or replacement of fuel-burning equipment, including the burners and components, as necessary, for proper operation as specified by the manufacturer.
- (II) Inspection of the flame pattern and adjustment of the burner, as necessary, to optimize the flame pattern to minimize total emissions of NOx and, to the extent possible, emissions of CO.
- (III) Inspection and adjustment, as necessary, of the air-to-fuel ratio control system to ensure proper calibration and operation as specified by the manufacturer.

010 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall, maintain, and operate the air contamination source in accordance with the manufacturer's specifications and with good operating practices.

011 [25 Pa. Code §129.93]

Presumptive RACT emission limitations

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

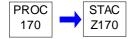




Source ID: 170 Source Name: PARTS CLEANERS

Source Capacity/Throughput: N/A

N/A



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 §129.63]

Degreasing operations

- (a) Cold cleaning machines. Except for those subject to the Federal National emissions standards for hazardous air pollutants (NESHAP) for halogenated solvent cleaners under 40 CFR Part 63 (relating to National emission standards for hazardous air pollutants for source categories), this subsection applies to cold cleaning machines that use 2 gallons or more of solvents containing greater than 5% VOC content by weight for the cleaning of metal parts.
 - (1) Immersion cold cleaning machines shall have a freeboard ratio of 0.50 or greater.
 - (2) Immersion cold cleaning machines and remote reservoir cold cleaning machines shall:
- (i) Have a permanent, conspicuous label summarizing the operating requirements in paragraph (3). In addition, the label shall include the following discretionary good operating practices:
- (A) Cleaned parts should be drained at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts should be positioned so that solvent drains directly back to the cold cleaning machine.
- (B) When a pump-agitated solvent bath is used, the agitator should be operated to produce a rolling motion of the solvent with no observable splashing of the solvent against the tank walls or the parts being cleaned.



- (C) Work area fans should be located and positioned so that they do not blow across the opening of the degreaser unit.
- (ii) Be equipped with a cover that shall be closed at all times except during cleaning of parts or the addition or removal of solvent. For remote reservoir cold cleaning machines which drain directly into the solvent storage reservoir, a perforated drain with a diameter of not more than 6 inches shall constitute an acceptable cover.
 - (3) Cold cleaning machines shall be operated in accordance with the following procedures:
- (i) Waste solvent shall be collected and stored in closed containers. The closed containers may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
- (ii) Flushing of parts using a flexible hose or other flushing device shall be performed only within the cold cleaning machine. The solvent spray shall be a solid fluid stream, not an atomized or shower spray.
- (iii) Sponges, fabric, wood, leather, paper products and other absorbent materials may not be cleaned in the cold cleaning machine.
 - (iv) Air agitated solvent baths may not be used.
 - (v) Spills during solvent transfer and use of the cold cleaning machine shall be cleaned up immediately.
- (4) After December 22, 2002, a person may not use, sell or offer for sale for use in a cold cleaning machine any solvent with a vapor pressure of 1.0 millimeter of mercury (mm Hg) or greater and containing greater than 5% VOC by weight, measured at 20°C (68°F) containing VOCs.
- (5) On and after December 22, 2002, a person who sells or offers for sale any solvent containing VOCs for use in a cold cleaning machine shall provide, to the purchaser, the following written information:
 - (i) The name and address of the solvent supplier.
 - (ii) The type of solvent including the product or vendor identification number.
 - (iii) The vapor pressure of the solvent measured in mm hg at 20°C (68°F).
- (6) A person who operates a cold cleaning machine shall maintain for at least 2 years and shall provide to the Department, on request, the information specified in paragraph (5). An invoice, bill of sale, certificate that corresponds to a number of sales, Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this section.
 - (7) Paragraph (4) does not apply:
 - (i) To cold cleaning machines used in extreme cleaning service.
- (ii) If the owner or operator of the cold cleaning machine demonstrates, and the Department approves in writing, that compliance with paragraph (4) will result in unsafe operating conditions.
 - (iii) To immersion cold cleaning machines with a freeboard ratio equal to or greater than 0.75.
- (b) (e) Not applicable.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



63-00027



SECTION D. Source Level Requirements

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

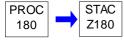
Source Capacity/Throughput: 10.000 Tons/HR

N/A

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

FURNACES= 20 MM<50MM

NOX RACT LIMITS PRESUMPTIVE RACT II



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The permittee shall conduct periodic monitoring for NOx and CO emissions from the furnace at a minimum of semi-annually (twice per calendar year) but no sooner than three (3) calendar months from the date of the previous test. A Department-approved performance (stack) test that has been performed within six calendar months prior to the scheduled periodic monitoring may be used in lieu of the periodic monitoring for that time period. A portable gas analyzer may be used to satisfy the requirements of this condition utilizing three test runs of twenty (20) minutes for each test run. The Department may alter the frequency of portable analyzer tests based on the test results. The frequency of portable gas analyzer tests may be altered only with the Department's prior written approval. The portable gas analyzer shall be used and maintained according to the manufacturer's specifications and the procedures specified in ASTM D6522 or equivalent procedures, as approved by the Department. The permittee may repeat portable analyzer testing without additional protocol approvals provided that the same method and equipment are used.

002 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall install, operate, and maintain a gas flow meter on the fuel supply to this furnace.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall record each tune-up and adjustment conducted. This record must contain, at a minimum:

- (1) The date of the tuning procedure.
- (2) The name of the service company and the technician performing the procedure.
- (3) The final operating rate or load.
- (4) The final NOx and CO emission rates.
- (5) The final excess oxygen rate.
- (6) Other information required by the applicable operating permit.



004 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The permittee shall maintain the following comprehensive and accurate records for this source:

- The total natural gas consumption to each furnace (in MMscf/yr or equivalent) on a 12-month rolling basis.
- The hours of operation of each furnace on a 12-month rolling basis.
- Records of any periodic monitoring (portable analyzer) results conducted.

005 [25 Pa. Code §129.115]

Written notification, compliance demonstration and recordkeeping and reporting requirements

- (a) (e) Not applicable.
- (f) The owner and operator of an air contamination source subject to this section and §129.111—§129.114 shall keep records to demonstrate compliance with §129.111—§129.114 and submit reports to the Department or appropriate approved local air pollution control agency in accordance with the applicable regulations in 25 Pa. Code, Part I, Subpart C, Article III (relating to air resources) and as specified in the operating permit or plan approval for the air contamination source as follows:
- (1) The records shall include sufficient data and calculations to demonstrate that the requirements of §129.111—§129.114 are met.
- (2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
- (3) The records necessary to determine compliance shall be reported to the Department or appropriate approved local air pollution control agency on a schedule specified in the applicable regulation or as otherwise specified in the operating permit or plan approval for the air contamination source.
- (g) (j) Not applicable.
- (k) The records shall be retained by the owner or operator for 5 years and made available to the Department or appropriate approved local air pollution control agency upon receipt of a written request from the Department or appropriate approved local air pollution control agency.

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.

006 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall conduct an annual tune-up in accordance with the procedures in 40 CFR 63.11223 (relating to how do I demonstrate continuous compliance with the work practice and management practice standards?).

- (A) Each annual tune-up shall occur not less than 3 months and not more than 12 months after the date of the previous tune-up.
 - (B) The annual tune-up must include, at a minimum, the following:
- (I) Inspection and cleaning or replacement of fuel-burning equipment, including the burners and components, as necessary, for proper operation as specified by the manufacturer.
- (II) Inspection of the flame pattern and adjustment of the burner, as necessary, to optimize the flame pattern to minimize total emissions of NOx and, to the extent possible, emissions of CO.
- (III) Inspection and adjustment, as necessary, of the air-to-fuel ratio control system to ensure proper calibration and operation as specified by the manufacturer.





007 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall, maintain, and operate the air contamination source in accordance with the manufacturer's specifications and with good operating practices.

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. ***







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

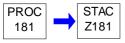
> Source Capacity/Throughput: 26.100 MMBTU/HR

> > N/A

N/A

58.250 MCF/HR

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



RESTRICTIONS. I.

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

TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The permittee shall conduct periodic monitoring for NOx and CO emissions from the furnace at a minimum of semiannually (twice per calendar year) but no sooner than three (3) calendar months from the date of the previous test. A Department-approved performance (stack) test that has been performed within six calendar months prior to the scheduled periodic monitoring may be used in lieu of the periodic monitoring for that time period. A portable gas analyzer may be used to satisfy the requirements of this condition utilizing three test runs of twenty (20) minutes for each test run. The Department may alter the frequency of portable analyzer tests based on the test results. The frequency of portable gas analyzer tests may be altered only with the Department's prior written approval. The portable gas analyzer shall be used and maintained according to the manufacturer's specifications and the procedures specified in ASTM D6522 or equivalent procedures, as approved by the Department. The permittee may repeat portable analyzer testing without additional protocol approvals provided that the same method and equipment are used.

002 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall install, operate, and maintain a gas flow meter on the fuel supply to this furnace.

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall record each tune-up and adjustment conducted. This record must contain, at a minimum:

- (1) The date of the tuning procedure.
- (2) The name of the service company and the technician performing the procedure.
- (3) The final operating rate or load.
- (4) The final NOx and CO emission rates.
- (5) The final excess oxygen rate.
- (6) Other information required by the applicable operating permit.



004 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The permittee shall maintain the following comprehensive and accurate records for this source:

- The total natural gas consumption to each furnace (in MMscf/yr or equivalent) on a 12-month rolling basis.
- The hours of operation of each furnace on a 12-month rolling basis.
- Records of any periodic monitoring (portable analyzer) results conducted.

005 [25 Pa. Code §129.115]

Written notification, compliance demonstration and recordkeeping and reporting requirements

- (a) (e) Not applicable.
- (f) The owner and operator of an air contamination source subject to this section and §129.111—§129.114 shall keep records to demonstrate compliance with §129.111—§129.114 and submit reports to the Department or appropriate approved local air pollution control agency in accordance with the applicable regulations in 25 Pa. Code, Part I, Subpart C, Article III (relating to air resources) and as specified in the operating permit or plan approval for the air contamination source as follows:
- (1) The records shall include sufficient data and calculations to demonstrate that the requirements of §129.111—§129.114 are met.
- (2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
- (3) The records necessary to determine compliance shall be reported to the Department or appropriate approved local air pollution control agency on a schedule specified in the applicable regulation or as otherwise specified in the operating permit or plan approval for the air contamination source.
- (g) (j) Not applicable.
- (k) The records shall be retained by the owner or operator for 5 years and made available to the Department or appropriate approved local air pollution control agency upon receipt of a written request from the Department or appropriate approved local air pollution control agency.

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.

006 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall conduct an annual tune-up in accordance with the procedures in 40 CFR 63.11223 (relating to how do I demonstrate continuous compliance with the work practice and management practice standards?).

- (A) Each annual tune-up shall occur not less than 3 months and not more than 12 months after the date of the previous tune-up.
 - (B) The annual tune-up must include, at a minimum, the following:
- (I) Inspection and cleaning or replacement of fuel-burning equipment, including the burners and components, as necessary, for proper operation as specified by the manufacturer.
- (II) Inspection of the flame pattern and adjustment of the burner, as necessary, to optimize the flame pattern to minimize total emissions of NOx and, to the extent possible, emissions of CO.
- (III) Inspection and adjustment, as necessary, of the air-to-fuel ratio control system to ensure proper calibration and operation as specified by the manufacturer.





007 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall, maintain, and operate the air contamination source in accordance with the manufacturer's specifications and with good operating practices.

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. ***



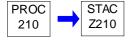




Source ID: 210 Source Name: COOLING TOWERS

Source Capacity/Throughput: 180.000 Gal/HR

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



I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

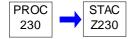




Source ID: 230 Source Name: VEHICLE TRAVEL (PAVED ROADS)

Source Capacity/Throughput: 30.000 Miles/HR

N/A



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. ***





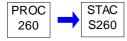


Source ID: 260 Source Name: HYBRID ANNEAL FURNACE

> Source Capacity/Throughput: 34.800 MMBTU/HR

> > N/A

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



RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

Per PA-63-00027B, condition #3, emissions from the Plate Anneal Furnace shall be limited to the following:

- 11.7 TPY NOx;
- 4.9 TPY CO; and
- 1.7 TPY VOCs.

003 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner and operator shall not exceed the following emission limitation for this source:

• 0.18 lbs NOx/MMBtu heat input

TESTING REQUIREMENTS.

004 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The Owner/Operator shall conduct a performance (stack) test on Source 260, Hybrid Annealing Furnace, within 180 days of the date of this authorization, or within a timeframe extended by the Department in writing, as well as, at a minimum, every five (5) years after the initial testing date, or at a timeframe extended by the Department in writing. Applicable test methods shall be approved by the Department. The performance test shall be conducted in accordance with the requirements of 25 Pa. Code §139.

III. MONITORING REQUIREMENTS.

005 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The permittee shall conduct periodic monitoring for NOx and CO emissions from the furnace at a minimum of semiannually (twice per calendar year) but no sooner than three (3) calendar months from the date of the previous test. A Department-approved performance (stack) test that has been performed within six calendar months prior to the scheduled periodic monitoring may be used in lieu of the periodic monitoring for that time period. A portable gas analyzer may be used to satisfy the requirements of this condition utilizing three test runs of twenty (20) minutes for each test run. The Department may alter the frequency of portable analyzer tests based on the test results. The frequency of portable gas analyzer tests may be altered only with the Department's prior written approval. The portable gas analyzer shall be used and maintained





according to the manufacturer's specifications and the procedures specified in ASTM D6522 or equivalent procedures, as approved by the Department. The permittee may repeat portable analyzer testing without additional protocol approvals provided that the same method and equipment are used.

006 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall install, operate, and maintain a gas flow meter on the fuel supply to this furnace.

RECORDKEEPING REQUIREMENTS.

007 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

008 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

009 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall record each tune-up and adjustment conducted. This record must contain, at a minimum:

- (1) The date of the tuning procedure.
- (2) The name of the service company and the technician performing the procedure.
- (3) The final operating rate or load.
- (4) The final NOx and CO emission rates.
- (5) The final excess oxygen rate.
- (6) Other information required by the applicable operating permit.

010 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The permittee shall maintain the following comprehensive and accurate records for this source:

- The total natural gas consumption to the furnace (in MMscf/yr or equivalent) on a 12-month rolling basis.
- The total natural gas consumption of the furnace on an hourly basis.
- The hours of operation of the furnace on a 12-month rolling basis.
- Records of any periodic monitoring (portable analyzer) results conducted.
- Records of any performance testing (stack testing) results conducted.

011 [25 Pa. Code §129.115]

Written notification, compliance demonstration and recordkeeping and reporting requirements

(a) - (e) Not applicable.

(f) The owner and operator of an air contamination source subject to this section and §129.111—§129.114 shall keep records to demonstrate compliance with §129.111—§129.114 and submit reports to the Department or appropriate approved local air pollution control agency in accordance with the applicable regulations in 25 Pa. Code, Part I, Subpart C, Article III (relating to air resources) and as specified in the operating permit or plan approval for the air contamination source





as follows:

- (1) The records shall include sufficient data and calculations to demonstrate that the requirements of §129.111—§129.114 are met.
- (2) Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
- (3) The records necessary to determine compliance shall be reported to the Department or appropriate approved local air pollution control agency on a schedule specified in the applicable regulation or as otherwise specified in the operating permit or plan approval for the air contamination source.
- (g) (j) Not applicable.
- (k) The records shall be retained by the owner or operator for 5 years and made available to the Department or appropriate approved local air pollution control agency upon receipt of a written request from the Department or appropriate approved local air pollution control agency.

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.

012 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall install, maintain, and operate the air contamination source in accordance with the manufacturer's specifications and with good operating practices.

013 [25 Pa. Code §129.114]

Alternative RACT proposal and petition for alternative compliance schedule

The owner or operator shall conduct an annual tune-up in accordance with the procedures in 40 CFR 63.11223 (relating to how do I demonstrate continuous compliance with the work practice and management practice standards?).

- (A) Each annual tune-up shall occur not less than 3 months and not more than 12 months after the date of the previous tune-up.
 - (B) The annual tune-up must include, at a minimum, the following:
- (I) Inspection and cleaning or replacement of fuel-burning equipment, including the burners and components, as necessary, for proper operation as specified by the manufacturer.
- (II) Inspection of the flame pattern and adjustment of the burner, as necessary, to optimize the flame pattern to minimize total emissions of NOx and, to the extent possible, emissions of CO.
- (III) Inspection and adjustment, as necessary, of the air-to-fuel ratio control system to ensure proper calibration and operation as specified by the manufacturer.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***

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SECTION E. Source Group Restrictions.

Group Name: FURNACES - SOX/PM REQ.

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

Sources included in this group

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

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

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

002 [25 Pa. Code §123.21]

General

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

004 [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.

IV. RECORDKEEPING REQUIREMENTS.

005 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

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 this group of sources.





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).

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. ***



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SECTION E. Source Group Restrictions.

Group Name: FURNACES= 20 MM<50MM

Group Description: Furnaces - RACT/Periodic Monitoring

Sources included in this group

	ID	Name	
	160	60 D.W.S.L. 400" ANNEALING FURNACE	
Ī	180	OLSON 110" MILL REHEAT FURNACE (# 8)	

I. RESTRICTIONS.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

001 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §129.93]

Presumptive RACT emission limitations

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

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [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.

004 [25 Pa. Code §129.93]

Presumptive RACT emission limitations

The permittee shall perform an annual adjustment or tune-up as required by RACT Operating Permit No. 63-000-027, for these furnaces. This adjustment shall include, at a minimum, the following:

(i) Inspection, adjustment, cleaning or replacement of fuel-burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.





SECTION E. Source Group Restrictions.

- (ii) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NOx, and to the extent practicable minimize emissions of CO.
- (iii) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and opertion as specified by the manufacturer.

VII. ADDITIONAL REQUIREMENTS.

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: MECH. PROCESSES

Group Description: Non-combustion particulate sources, 123.13

Sources included in this group

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

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***



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SECTION E. Source Group Restrictions.

Group Name: NOX RACT LIMITS

Group Description: 8 - 110" Mill Heat Treating Furnaces

Sources included in this group

ID	Name	
110	0 110" MILL HEATING FURNACES 1-7	
180	OLSON 110" MILL REHEAT FURNACE (# 8)	

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

002 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***





SECTION E. Source Group Restrictions.

Group Name: PRESUMPTIVE RACT II

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

Sources included in this group

ID	Name	
110	110" MILL HEATING FURNACES 1-7	
180	OLSON 110" MILL REHEAT FURNACE (# 8)	
181	181 LOI 110" MILL REHEAT FURNACE (# 9)	
260	HYBRID ANNEAL FURNACE	

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §129.100]

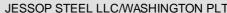
Compliance demonstration and recordkeeping requirements.

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

002 [25 Pa. Code §129.97]

$\label{lem:presumptive RACT requirements, RACT emission limitations and petition for alternative compliance schedule. \\$

(b) The owner and operator of a source specified in this subsection, which is located at a major NOx emitting facility or major VOC emitting facility subject to §129.96 shall comply with the following:





SECTION E. **Source Group Restrictions.**

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

II. TESTING REQUIREMENTS.

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

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.

[25 Pa. Code §129.100]

Compliance demonstration and recordkeeping requirements.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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



SECTION E. Source Group Restrictions.

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***







SECTION E. Source Group Restrictions.

Group Name: RACT II

Group Description: RACT II sources

Sources included in this group

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

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §129.99]

Alternative RACT proposal and petition for alternative compliance schedule.

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §129.100]

Compliance demonstration and recordkeeping requirements.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

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

VII. ADDITIONAL REQUIREMENTS.

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

*** Permit Shield in Effect. ***





SECTION F. Alternative Operation Requirements.

No Alternative Operations exist for this Title V facility.







SECTION G. Emission Restriction Summary.

Source Id	Source Description			
260	HYBRID ANNEAL	FURNACE		
Emission Limit			Pollutant	
4.900	Tons/Yr	PA-63-00027B	CO	
0.180	Lbs/MMBTU	CbC RACT III	NOX	
11.700	Tons/Yr	PA-63-00027B	NOX	
1.700	Tons/Yr	PA-63-00027B	VOC	

Site Emission Restriction Summary

Emission Limit	Pollutant
Elilloololi Elillit	1 Ollatarit





SECTION H. Miscellaneous.

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

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





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