



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

PLAN APPROVAL

Issue Date: October 2, 2024
Revision Date: September 15, 2026
Revision Type: Extension

Effective Date: September 28, 2026
Expiration Date: March 28, 2027

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 construct, install, modify or reactivate the air emission source(s) more fully described in the site inventory list. This Facility is subject to all terms and conditions specified in this plan approval. Nothing in this plan approval 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 plan approval condition is set forth in brackets. All terms and conditions in this permit are federally enforceable unless otherwise designated as "State-Only" requirements.

Plan Approval No. 04-00059E

Federal Tax Id - Plant Code: 37-1731204-2

Owner Information

Name: IPSCO KOPPEL TUBULARS LLC
Mailing Address: PO BOX 750
BEAVER FALLS, PA 15010-0750

Plant Information

Plant: TENARIS KOPPEL TUBULARS LLC/KOPPEL PLT
Location: 04 Beaver County 04940 Koppel Borough
SIC Code: 3312 Manufacturing - Blast Furnaces And Steel Mills

Responsible Official

Name: JOHN VASQUEZ
Title: STEEL SHOP SR DIR
Phone: (412) 596 - 5176 Email: jvasquezvalera@tenaris.com

Plan Approval Contact Person

Name: ALEX RICHMOND
Title: HSE MGR
Phone: (724) 847 - 5131 Email: ARICHMOND@tenaris.com

[Signature] _____

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



Plan Approval Description

This plan approval authorizes replacing the existing melt shop baghouse with a new unit with a higher hourly average nominal airflow of 1,052,657 scfm; increasing steel production capacity 598,000 (prime cast tons) to 771,618 tons per year (TPY) (700,000 MT/Y); and installation of a new cooling tower.



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

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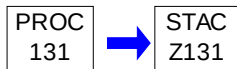
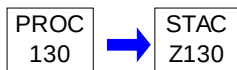
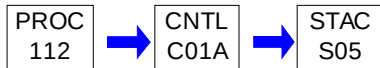
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**SECTION A. Plan Approval Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
109	#4 MELT SHOP - "EAF, LRS, CONT. CASTER & SUP. ACT."		
110	CHARGING		
111	EAF TAPPING/EBT		
112	LADLE REFINING SYSTEM		
116	DRY LIME AND ALLOY UNLOADING STATION		
130	ROADWAY FUGITIVES		
131	COOLING TOWER		
C01	BAGHOUSE (MELT SHOP)		
C01A	BAGHOUSE (MELT SHOP)		
S05	#4 BAGHOUSE STACK (10 SNUB STACKS)		
Z130	ROADWAY EMISSION FUGITIVES		
Z131	COOLING TOWER FUGITIVES		

PERMIT MAPS

**SECTION B. General Plan Approval Requirements****#001 [25 Pa. Code § 121.1]****Definitions**

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

#002 [25 Pa. Code § 127.12b (a) (b)]**Future Adoption of Requirements**

The issuance of this plan approval does not prevent the future adoption by the Department of any rules, regulations or standards, or the issuance of orders necessary to comply with the requirements of the Federal Clean Air Act or the Pennsylvania Air Pollution Control Act, or to achieve or maintain ambient air quality standards. The issuance of this plan approval shall not be construed to limit the Department's enforcement authority.

#003 [25 Pa. Code § 127.12b]**Plan Approval Temporary Operation**

This plan approval authorizes temporary operation of the source(s) covered by this plan approval provided the following conditions are met.

(a) When construction, installation, modification, or reactivation is being conducted, the permittee shall provide written notice to the Department of the completion of the activity approved by this plan approval and the permittee's intent to commence operation at least five (5) working days prior to the completion of said activity. The notice shall state when the activity will be completed and when the permittee expects to commence operation. When the activity involves multiple sources on different time schedules, notice is required for the commencement of operation of each source.

(b) Pursuant to 25 Pa. Code § 127.12b (d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

(c) This plan approval authorizes a temporary operation period not to exceed 180 days from the date of commencement of operation, provided the Department receives notice from the permittee pursuant to paragraph (a), above.

(d) The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted, in writing, to the Department at least 30 days prior to the end of the initial 180-day shakedown period and shall provide a description of the compliance status of the source, a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

(e) The notice submitted by the permittee pursuant to subpart (a) above, prior to the expiration of the plan approval, shall modify the plan approval expiration date on Page 1 of this plan approval. The new plan approval expiration date shall be 180 days from the date of commencement of operation.

#004 [25 Pa. Code § 127.12(a) (10)]**Content of Applications**

The permittee shall maintain and operate the sources and associated air cleaning devices in accordance with good engineering practice as described in the plan approval application submitted to the Department.

#005 [25 Pa. Code §§ 127.12(c) and (d) & 35 P.S. § 4013.2]**Public Records and Confidential Information**

(a) The records, reports or information obtained by the Department or referred to at public hearings shall be available to the public, except as provided in paragraph (b) of this condition.

(b) Upon cause shown by the permittee that the records, reports or information, or a particular portion thereof, but not emission data, to which the Department has access under the act, if made public, would divulge production or sales figures or methods, processes or production unique to that person or would otherwise tend to affect adversely the

**SECTION B. General Plan Approval Requirements**

competitive position of that person by revealing trade secrets, including intellectual property rights, the Department will consider the record, report or information, or particular portion thereof confidential in the administration of the act. The Department will implement this section consistent with sections 112(d) and 114(c) of the Clean Air Act (42 U.S.C.A. § 7412(d) and 7414(c)). Nothing in this section prevents disclosure of the report, record or information to Federal, State or local representatives as necessary for purposes of administration of Federal, State or local air pollution control laws, or when relevant in a proceeding under the act.

#006 [25 Pa. Code § 127.12b]**Plan Approval Terms and Conditions**

[Additional authority for this condition is derived from 25 Pa. Code Section 127.13]

(a) This plan approval will be valid for a limited time, as specified by the expiration date contained on Page 1 of this plan approval. Except as provided in § 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

(b) If construction has commenced, but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be postmarked at least thirty (30) days prior to the expiration date. The request for an extension shall include the following:

- (i) A justification for the extension,
- (ii) A schedule for the completion of the construction

If construction has not commenced before the expiration of this plan approval, then a new plan approval application must be submitted and approval obtained before construction can commence.

(c) If the construction, modification or installation is not commenced within 18 months of the issuance of this plan approval or if there is more than an 18-month lapse in construction, modification or installation, a new plan approval application that meets the requirements of 25 Pa. Code Chapter 127, Subchapter B (related to plan approval requirements), Subchapter D (related to prevention of significant deterioration of air quality), and Subchapter E (related to new source review) shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

#007 [25 Pa. Code § 127.32]**Transfer of Plan Approvals**

(a) This plan approval may not be transferred from one person to another except when a change of ownership is demonstrated to the satisfaction of the Department and the Department approves the transfer of the plan approval in writing.

(b) Section 127.12a (relating to compliance review) applies to a request for transfer of a plan approval. A compliance review form shall accompany the request.

(c) This plan approval is valid only for the specific source and the specific location of the source as described in the application.

#008 [25 Pa. Code § 127.12(a)(4) & 35 P.S. § 4008 & § 114 of the CAA]**Inspection and Entry**

(a) 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.

(b) The permittee shall also allow the Department to have access at reasonable times to said sources and associated air cleaning devices with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act and regulations adopted under the act.

**SECTION B. General Plan Approval Requirements**

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

#009 [25 Pa. Code 127.13a]**Plan Approval Changes for Cause**

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

- (a) The permittee constructs or operates the source subject to the plan approval in violation of the act, the Clean Air Act, the regulations promulgated under the act or the Clean Air Act, a plan approval or permit or in a manner that causes air pollution.
- (b) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.
- (c) The permittee fails to submit a report required by this plan approval.
- (d) The Environmental Protection Agency determines that this plan approval is not in compliance with the Clean Air Act or the regulations thereunder.

#010 [25 Pa. Code §§ 121.9 & 127.216]**Circumvention**

- (a) The permittee, 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 plan approval, 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.

#011 [25 Pa. Code § 127.12c]**Submissions**

Reports, test data, monitoring data, notifications shall be submitted to the:

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

#012 [25 Pa. Code § 127.12(a)(9) & 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 facility. The permittee shall submit the RMP to the Environmental Protection Agency according to the following schedule and requirements:

(1) The permittee shall submit the first RMP to a central point specified by the Environmental Protection Agency no later than the latest of the following:

**SECTION B. General Plan Approval Requirements**

- (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 the Environmental Protection Agency 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 plan approval 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.

#013 [25 Pa. Code § 121.7]**Prohibition of Air Pollution**

No person may permit air pollution as that term is defined in the Air Pollution Control Act (35 P.S. §§ 4001-4015).

#014 [25 Pa. Code § 127.25]**Compliance Requirement**

A person may not cause or permit the operation of a source subject to § 127.11 (relating to plan approval requirements), unless the source and air cleaning devices identified in the application for the plan approval 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 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.



SECTION C. Site Level Plan Approval Requirements

I. RESTRICTIONS.

Throughput Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Steel production at the facility shall not exceed 771,618 tons (700,000 MT/Y) in any consecutive 12-month period.

II. TESTING REQUIREMENTS.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

If, at any time, the Department has cause to believe that air contaminant emissions from the sources listed in this plan approval may be in excess of the limitations specified in, or established pursuant to this plan approval or the permittee's operating permit, the permittee may be required to conduct test methods and procedures deemed necessary by the Department to determine the actual emissions rate. Such testing shall be conducted in accordance with 25 Pa. Code Chapter 139, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Performance testing shall be conducted as follows:

- (a) 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.
- (b) The permittee shall notify the Regional Air Quality Manager and Division of Source Testing and Monitoring at least 15 days prior to any performance test so that an observer may be present at the time of the test. This notification may be sent by email. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.
- (c) One (1) electronic copy of a complete test report shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program.
- (d) Pursuant to 25 Pa. Code Section 139.53(b), a complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:
 - (1) A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
 - (2) Permit number(s) and condition(s) which are the basis for the evaluation.
 - (3) Summary of results with respect to each applicable permit condition.
 - (4) Statement of compliance or non-compliance with each applicable permit condition.
- (e) 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.
- (f) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.
- (g) Pursuant to 25 Pa. Code Section 139.53(a)(1) and 139.53(a)(3) all electronic submittals shall be sent to raepstacktesting@pa.gov with a copy sent to ra-epswstacktesting@pa.gov.
- (h) 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 Plan Approval Requirements**

default.

III. MONITORING REQUIREMENTS.**# 004 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Visible emissions may be measured using either of the following:

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

005 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

A facility-wide inspection shall be conducted at a minimum of once each operating day. 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 malodors 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 sources are in operation. If any visible stack emissions, fugitive emissions, or potentially objectionable odors are apparent, the permittee shall take corrective action. Records of each inspection shall be maintained in a log and at the minimum include the date, time, name and title of the observer, along with any corrective action taken as a result.

IV. RECORDKEEPING REQUIREMENTS.**# 006 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall maintain the following comprehensive and accurate records beginning within 180 days of the issuance of this plan approval:

- (a) Facility-wide emissions on a 12-month rolling basis for all contaminants.
- (b) Facility-wide natural gas usage on a 12-month rolling basis.
- (c) Results of facility-wide inspections including the date, time, name, and title of the observer, along with any corrective action taken as a result.
- (d) Results of any visible emissions observations to demonstrate compliance with 25 Pa. Code §123.41.
- (e) Copies of the manufacturers' recommended specifications and maintenance schedules for each air contamination source and air cleaning device and/or site-specific developed maintenance schedules.
- (f) All maintenance performed on each air contamination source and air cleaning device.

007 [25 Pa. Code §127.12b]**Plan approval 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.

**SECTION C. Site Level Plan Approval Requirements****V. REPORTING REQUIREMENTS.****# 008 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

Malfunction reporting shall be conducted as follows:

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

(b) When the malfunction poses an imminent and substantial danger to the public health and safety, potential harm to the environment, the permittee shall report the incident to the Department within one hour of discovery. The permittee shall also notify the Department within one hour, when corrective measures have been accomplished.

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

(c) Initial reporting of the malfunction shall identify the following items to the extent known:

- (1) Name and location of the facility;
- (2) Nature and cause of the malfunction;
- (3) Time when the malfunction or breakdown was first observed;
- (4) Expected duration of increased emissions; and
- (5) Estimated rate of emissions.

(d) Malfunctions shall be reported to the Department by email (at an address provided by the Department) or at the following address:

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

(e) If requested by the Department, the permittee shall submit a full written report to the Department including final determinations of the items identified in (3) and the corrective measures taken on the malfunction. The report shall be submitted within 15 days of the Department's request or accomplishing corrective measures, whichever is later.

009 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Annual emissions reporting shall be conducted as follows:

(a) The permittee shall submit by March 1 of each year, a source report for the preceding calendar year for all sources authorized under this plan approval. The report shall include information for all previously reported sources, new sources which were first operated during the preceding calendar year and sources modified during the same period which were not previously reported.

(b) The source report; in a form as the Department may prescribe; for classes or categories of sources; shall show the actual emissions of carbon monoxide (CO), oxides of nitrogen (NO_x), particulate matter less than 10 micrometers in diameter (PM₁₀), particulate matter less than 2.5 micrometers in diameter (PM_{2.5}), sulfur dioxide (SO₂), volatile organic compounds (VOC), total hazardous air pollutants (HAP), speciated individual HAP emissions (per the Department's Emissions Inventory Reporting Instructions), and greenhouse gases, expressed as CO₂e for each reporting period. A description of the method used to calculate the emissions and the time period over which the calculation is based shall be included. The statement shall also contain a certification by a company officer or the plant manager that the information

**SECTION C. Site Level Plan Approval Requirements**

contained in the statement is accurate.

(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.

010 [40 CFR Part 60 Standards of Performance for New Stationary Sources §40 CFR 60.4]**Subpart A - General Provisions****Address.**

The Facility is subject New Source Performance Standards from 40 CFR Part 60 Subpart AAa. In accordance with 40 CFR §60.4, copies of all requests, reports, applications, submittals, and other communications regarding the affected sources shall be forwarded to the Department at the address listed below unless otherwise noted.

Pennsylvania Department of Environmental Protection
Air Quality Program
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Copies of all requests, reports, applications, submittals, and other communications shall also be submitted to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) accessible at <https://cdx.epa.gov/> unless electronic reporting is not available, in which case a copy shall be sent to the following address:

United States Environmental Protection Agency
Region III, Air and Radiation Division
Permits Branch (3AD10)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

011 [40 CFR Part 63 NESHAPS for Source Categories §40 CFR 63.13]**Subpart A--General Provisions****Addresses of State air pollution control agencies and EPA Regional Offices.**

The Facility is subject National Emission Standards for Hazardous Air Pollutants from 40 CFR Part 63 Subpart YYYYY. In accordance with 40 CFR §63.13, copies of all requests, reports, applications, submittals, and other communications regarding the affected sources shall be forwarded to the Department at the address listed below unless otherwise noted.

Pennsylvania Department of Environmental Protection
Air Quality Program
400 Waterfront Drive
Pittsburgh, PA 15222-4745

Copies of all requests, reports, applications, submittals, and other communications shall also be submitted to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) accessible at <https://cdx.epa.gov/> unless electronic reporting is not available, in which case a copy shall be sent to the following address:

United States Environmental Protection Agency
Region III, Air and Radiation Division
Permits Branch (3AD10)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

**SECTION C. Site Level Plan Approval Requirements****VI. WORK PRACTICE REQUIREMENTS.****# 012 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall construct, operate, and maintain all air contamination sources and air cleaning devices authorized under this Plan Approval in accordance with the manufacturer's specifications and recommended maintenance schedules, or site-specific specifications developed in accordance with good engineering practice and prior operating experience approved by the Department in writing.

VII. ADDITIONAL REQUIREMENTS.**# 013 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

This plan approval authorizes replacing the existing melt shop baghouse with a new unit with a higher hourly average nominal airflow of 1,052,657 scfm; increasing steel production capacity 598,000 (prime cast tons) to 771,618 tons per year (TPY) (700,000 MT/Y); and installation of a new cooling tower.

014 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall comply with all applicable requirements of New Source Performance Standards from 40 CFR Part 60 Subpart AAa and National Emission Standards for Hazardous Air Pollutants from 40 CFR Part 63 Subpart YYYYY.

015 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Upon determination by the permittee that the air contamination sources and air cleaning devices covered by this plan approval are in compliance with all conditions of the plan approval, the permittee shall contact the Department's technical reviewer and schedule the Initial Operating Permit Inspection.

016 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Upon completion of the Initial Operating Permit Inspection and determination by the Department that the permittee is in compliance with all conditions of the plan approval, the permittee shall submit a revision to the Title V Operating Permit for this Facility within 120 days to incorporate the conditions of this plan approval.

017 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall submit requests to extend the temporary operation periods at least 15 days prior to the expiration date of any authorized period of temporary operation.

VIII. COMPLIANCE CERTIFICATION.

No additional compliance certifications exist except as provided in other sections of this plan approval including Section B (relating to Plan Approval General Requirements).

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

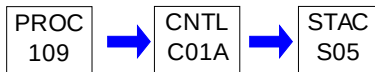
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 109

Source Name: #4 MELT SHOP - "EAF, LRS, CONT. CASTER & SUP. ACT."

Source Capacity/Throughput:

Conditions for this source occur in the following groups: MELT SHOP

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

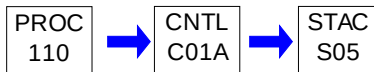
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 110

Source Name: CHARGING

Source Capacity/Throughput:

Conditions for this source occur in the following groups: MELT SHOP

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

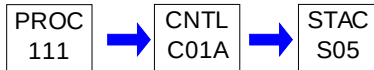
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 111

Source Name: EAF TAPPING/EBT

Source Capacity/Throughput:

Conditions for this source occur in the following groups: MELT SHOP

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 112

Source Name: LADLE REFINING SYSTEM

Source Capacity/Throughput:

Conditions for this source occur in the following groups: MELT SHOP

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

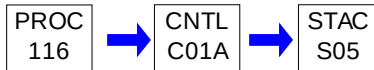
No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**SECTION D. Source Level Plan Approval Requirements**

Source ID: 116

Source Name: DRY LIME AND ALLOY UNLOADING STATION

Source Capacity/Throughput:

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

III. MONITORING REQUIREMENTS.

No additional monitoring requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

IV. RECORDKEEPING REQUIREMENTS.

No additional record keeping requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.

No additional work practice requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

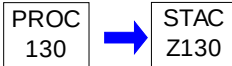
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 130

Source Name: ROADWAY FUGITIVES

Source Capacity/Throughput:

Conditions for this source occur in the following groups: MELT SHOP

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

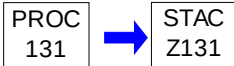
**SECTION D. Source Level Plan Approval Requirements**

Source ID: 131

Source Name: COOLING TOWER

Source Capacity/Throughput:

Conditions for this source occur in the following groups: MELT SHOP

**I. RESTRICTIONS.**

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval 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 plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements) and/or Section E (Source Group Restrictions).

**SECTION E. Source Group Plan Approval Restrictions.**

Group Name: MELT SHOP

Group Description:

Sources included in this group

ID	Name
109	#4 MELT SHOP - "EAF, LRS, CONT. CASTER & SUP. ACT."
110	CHARGING
111	EAF TAPPING/EBT
112	LADLE REFINING SYSTEM
130	ROADWAY FUGITIVES
131	COOLING TOWER

I. RESTRICTIONS.**Emission Restriction(s).****# 001 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The emissions from the Melt Shop shall not exceed the following limits:

- (a) 0.00066 gr/dscf of total PM (filterable and condensable)
- (b) 0.00066 gr/dscf of total PM10 (filterable and condensable)
- (c) 0.00066 gr/dscf of total PM2.5 (filterable and condensable)
- (d) 0.35 lbs/ton of steel of NOx
- (e) 2.5 lbs/ton of steel of CO
- (f) 0.48 lbs/ton of steel of SO2
- (g) 0.175 lbs/ton of steel of VOC

002 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

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 equal to or greater than 10% at any time.

003 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The cooling tower shall be designed to achieve a drift rate performance of 0.001%.

004 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

At all times, including startup and shutdown, emissions from Group Name: Melt Shop shall not exceed the following on a 12-month rolling basis:

- (a) 43.16 tons of total PM (filterable and condensable)
- (b) 29.81 tons of total PM10 (filterable and condensable)
- (c) 26.89 tons of total PM2.5 (filterable and condensable)
- (d) 135.03 tons of NOx
- (e) 964.52 tons of CO
- (f) 185.19 tons of SO2
- (g) 67.52 tons of VOC

II. TESTING REQUIREMENTS.**# 005 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall conduct an initial stack test within 180 days of startup, as well as periodically no less often than once every 5 years, for emissions of total PM (filterable), PM10 (filterable and condensable), PM2.5 (filterable and condensable),

**SECTION E. Source Group Plan Approval Restrictions.**

NO_x (as NO₂), CO, sulfur oxides (SO₂), lead (Pb), and volatile organic compounds (VOC's). in accordance with the requirements of 25 Pa. Code §139.

The frequency of periodic testing may be reduced by owner/operator request and Department approval.

006 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall conduct a performance evaluation of each Bag Leak Detection System in accordance with a site-specific monitoring plan.

007 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall develop, and submit to the Department for approval, upon request, a site-specific monitoring plan that addresses the following:

- (a) Installation of a Bag Leak Detection System;
- (b) Performance and equipment specifications;
- (c) Performance evaluation procedures and acceptance criteria (e.g., calibrations);
- (d) Initial and periodic adjustment of the Bag Leak Detection System, including how the alarm set-point will be established;
- (e) Operation of the Bag Leak Detection System, including quality assurance procedures;
- (f) How the Bag Leak Detection System will be maintained, including a routine maintenance schedule and spare parts inventory list;
- (g) How the Bag Leak Detection System output will be recorded and stored;
- (h) Ongoing operation, quality assurance, maintenance, and reporting procedures;
- (i) How the Bag Leak Detection System will be maintained, including a routine maintenance schedule and spare parts inventory list;
- (j) How the Bag Leak Detection System output will be recorded and stored.
- (k) Ongoing operation, quality assurance, maintenance, and reporting procedures;
- (l) Ongoing data quality assurance procedures. (QA/QC guidance may be found in 40 CFR § 63.8(d));
- (m) Ongoing recordkeeping and reporting procedures;
- (n) How the bag leak detection systems will comply with the provisions of this plan approval.
- (o) The manufacturer's recommended procedures and specifications and good engineering practices for installing, testing, and operating the Bag Leak Detection Systems.

008 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Within 180 days of startup of Module 2 of the melt shop baghouse, the permittee shall conduct an initial stack test for emissions of total PM (filterable), PM₁₀ (filterable and condensable), PM_{2.5} (filterable and condensable), NO_x (as NO₂), CO, sulfur oxides (SO₂), lead (Pb), and volatile organic compounds (VOC's). in accordance with the requirements of 25 Pa. Code §139.

III. MONITORING REQUIREMENTS.**# 009 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall submit a monitoring plan to the Department's Southwest Regional Office at least 90 days prior to the scheduled source testing (Method 9) required by this plan approval. This monitoring plan shall identify how the Bag Leak Detection Systems will comply with the provisions of this plan approval.

010 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall submit a revised compliance assurance monitoring (CAM) plan in accordance with 40 CFR Part 64 within 180 days of commencement of operation of C01A.

011 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall continuously monitor the pressure differential across the baghouse when operating using a magnehelic gauge or other equivalent device.

**SECTION E. Source Group Plan Approval Restrictions.****# 012 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall monitor the condition of the bags to determine if any bag is damaged or at the end of its life and needs to be replaced in accordance with the manufacturer's recommended specifications and recommended maintenance schedule.

013 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall monitor fan amperage on a daily basis while operating.

014 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall monitor the total dissolved solids to the cooling tower at a minimum of once every 180 days.

015 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

Baghouse C01A shall be equipped and operated at all times with a Bag Leak Detection System.

016 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

As part of this operational inspection, the facility shall verify the Bag Leak Detection System is operating and shall conduct a visible emission (VE) observation of the baghouse stack.

017 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall adhere to the control device's approved indicator range so that operation within the range shall provide reasonable assurance of compliance. The indicator ranges must be approved by the Department. The following indicator ranges shall be determined during the initial performance test or any subsequent Department approved performance tests unless otherwise stated:

- (a) The permittee shall develop an indicator range for airflow, measured as fan amperage or frequency, during their most recent department approved stack testing program, as applicable.
- (b) Triboelectric Bag Leak Detection System status/value.
- (c) Opacity reading.
- (d) The Department, at its discretion, may approve or deny a request to adjust the required indicator ranges.

018 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the control device.

- (a) The permittee shall maintain detectors or sensors at Department approved locations for obtaining data that is representative of the monitored indicator.
- (b) The permittee shall maintain verification procedures to confirm that the operational status of the monitoring devices is within the expected range. (Operational status pertains to the accuracy of the measured values.)
- (c) For QA/QC purposes, the permittee shall calibrate and check the accuracy of the monitoring equipment, according to the Manufacturer's recommended procedures.

019 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The Bag Leak Detection Systems shall be installed, calibrated, and put into operation on the baghouse to monitor the baghouse and filter performance:

- (a) Each Bag Leak Detection System must be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations, in accordance with the guidance provided in EPA-454/R-98-015, September 1997, and in accordance with good air pollution control practices.
- (b) The Bag Leak Detection System must be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 or fewer milligrams per actual cubic meter (0.0044 gr/cf).

**SECTION E. Source Group Plan Approval Restrictions.**

- (c) The Bag Leak Detection System sensor must provide output of absolute PM loadings.
- (d) The Bag Leak Detection System must be equipped with a device to continuously record the output signal from the sensor.
- (e) The Bag Leak Detection System must be equipped with an alarm system that will alert an operator automatically when an increase in relative PM emissions over a preset level is detected. The alarm must be located such that the alert is detected and recognized easily by an operator.
- (f) Where multiple bag leak detectors are required, the system's instrumentation and alarm may be shared among detectors.
- (g) The permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the bag leak detection systems.
- (h) The permittee shall calibrate and check the accuracy of the Bag Leak Detection Systems taking into account manufacturer's specifications at least annually.
- (i) An initial performance evaluation of the required Bag Leak Detection Systems will be required. The data collected from the bag leak detection systems during the initial performance test (Method 9) shall be used to provide a reasonable assurance of ongoing compliance.
- (j) Once the Bag Leak Detection Systems have been installed, calibrated and put into operation, the permittee shall utilize approved QA/QC practices that are adequate to ensure continuing validity of data and proper performance of the bag leak detection systems.

IV. RECORDKEEPING REQUIREMENTS.**# 020 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall maintain the following comprehensive and accurate records:

- (a) Daily pressure differential across the baghouse when operating;
- (b) Bag replacement in the baghouse;
- (c) Any maintenance performed on the baghouse;
- (d) Copy of the manufacturer's recommended specifications and recommended maintenance schedule;
- (e) Fan amperage monitoring; and
- (f) Results of each Bag Leak Detection System inspection, calibration, and validation check.
- (g) Daily Triboelectric Bag Leak Detection System I status - daily is defined as once per calendar day (when operating).

V. REPORTING REQUIREMENTS.

No additional reporting requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

VI. WORK PRACTICE REQUIREMENTS.**# 021 [25 Pa. Code §127.12b]****Plan approval terms and conditions.**

The permittee shall construct, operate, and maintain all air contamination sources and air cleaning devices authorized under this Plan Approval in accordance with the manufacturer's specifications and recommended maintenance schedules, or site-specific specifications developed in accordance with good engineering practice and prior operating experience approved by the Department in writing. A copy of the manufacturer's specifications and recommended maintenance schedules, or site-specific specifications developed in accordance with good engineering practice and prior operating experience for the proposed baghouse (Source ID C01A) shall be submitted within 180 days of issuance of this plan approval.

022 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

For each Bag Leak Detection System, the permittee shall initiate procedures to determine the cause of every alarm within 8 hours of the alarm.

023 [25 Pa. Code §127.12b]**Plan approval terms and conditions.**

The permittee must alleviate the cause of the alarm within 24 hours of the alarm by taking whatever corrective action(s) are

**SECTION E. Source Group Plan Approval Restrictions.**

necessary. Corrective actions may include, but are not limited to, the following:

- (a) Inspecting the fabric filter for air leaks, torn or broken bags or filter media, or any other condition that may cause an increase in PM emissions;
- (b) Sealing off defective bags or filter media;
- (c) Replacing defective bags or filter media or otherwise repairing the control device;
- (d) Sealing off a defective fabric filter compartment; and
- (e) Cleaning the Bag Leak Detection System probe or otherwise repairing the Bag Leak Detection System.

VII. ADDITIONAL REQUIREMENTS.

No additional requirements exist except as provided in other sections of this plan approval including Section B (Plan Approval General Requirements).

**SECTION F. Alternative Operation Requirements.**

No Alternative Operations exist for this Plan Approval facility.

**SECTION G. Emission Restriction Summary.**

No emission restrictions listed in this section of the permit.



SECTION H. Miscellaneous.



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