



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: December 4, 2007
Expiration Date: November 30, 2012

Effective Date: December 4, 2007

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

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

State Only Permit No: 43-00040

Federal Tax Id - Plant Code: 23-1327437-3

Owner Information

Name: WHEATLAND TUBE CO
Mailing Address: PO BOX 608
WHEATLAND, PA 16161-0608

Plant Information

Plant: WHEATLAND TUBE DIV / SHARON PLT
Location: 43 Mercer County 43001 Sharon City
SIC Code: 3317 Manufacturing - Steel Pipe And Tubes

Responsible Official

Name: EDWARD H BEST
Title: VP OF OPERATIONS
Phone: (724) 342 - 6851

Permit Contact Person

Name: ARTHUR E HALL
Title: DIR, ENVIRONMENTAL AFFAIR
Phone: (724) 342 - 6851

[Signature] _____
JOHN F GUTH, NORTHWEST REGION AIR PROGRAM MANAGER



SECTION A. Table of Contents

Section A. Facility/Source Identification

Table of Contents
Site Inventory List

Section B. General State Only Requirements

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

Section C. Site Level State Only Requirements

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

Section D. Source Level State Only Requirements

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

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

Section E. Alternative Operating Scenario(s)

- E-I: Restrictions
- E-II: Testing Requirements



SECTION A. Table of Contents

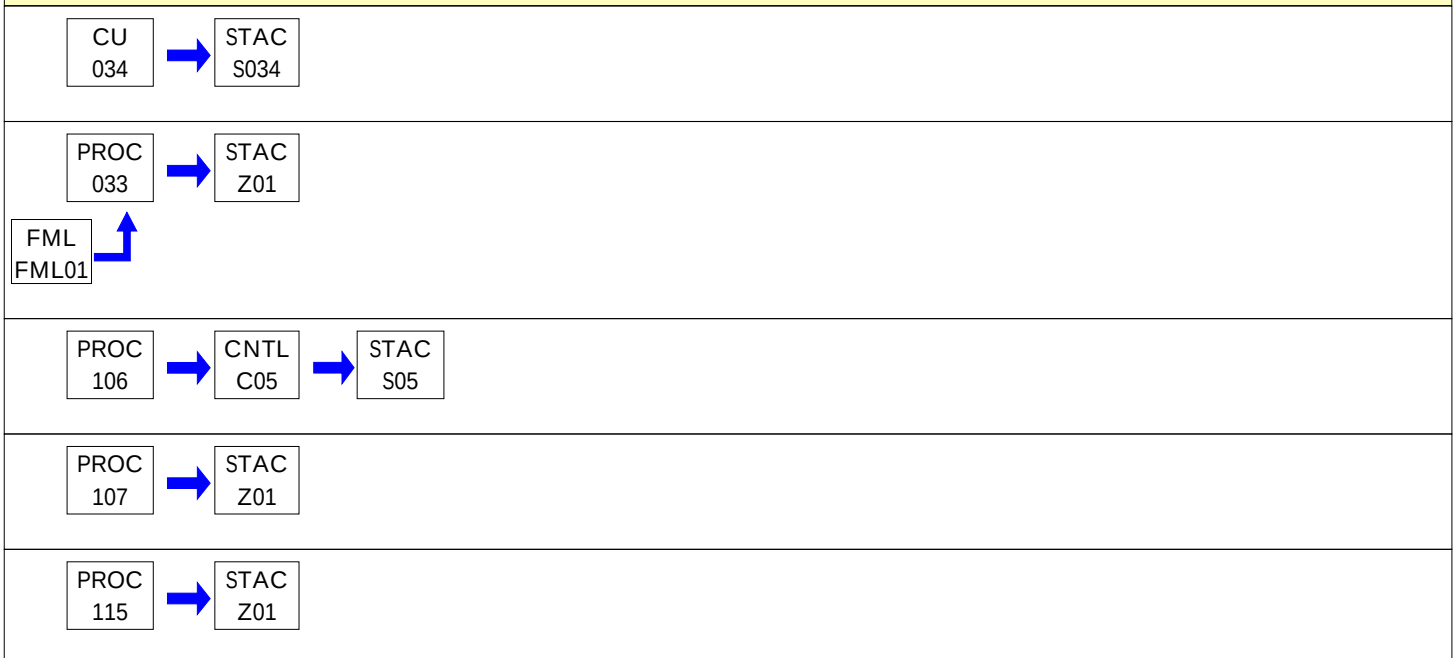
E-III: Monitoring Requirements
E-IV: Recordkeeping Requirements
E-V: Reporting Requirements
E-VI: Work Practice Standards
E-VII: Additional Requirements

Section F. Emission Restriction Summary

Section G. Miscellaneous

**SECTION A. Site Inventory List**

Source ID	Source Name	Capacity/Throughput	Fuel/Material
034	BOILER	2.500 MMBTU / HR	
		2.500 MCF / HR	Natural Gas
033	MISCELLANEOUS NATURAL GAS COMBUSTION (< 2.5 BTU / HR)		
106	#2 CONDUIT LINES - ZINC COATING	5.000 Tons / HR	STEEL
107	COLD SOLVENT CLEANERS		
115	VOC STORAGE TANKS (3)		
C05	#2 CONDUIT LINE ZINC COLLECTOR		
FML01	NATURAL GAS		
S034	BOILER STACK		
S05	CONDUIT LINE 2 BGHS STK		
Z01	FUGITIVE EMISSIONS		

PERMIT MAPS

SECTION B. General State Only Requirements

#001 [25 Pa. Code § 121.1]

Definitions.

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

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

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

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

Permit Renewal.

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

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

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

SECTION B. General State Only Requirements

(2) Three hundred seventy-five dollars for applications filed for the calendar years beginning in 2005.

This fee schedule shall apply to the processing of an application for an operating permit as well as the extension, modification, revision, renewal, and re-issuance of each operating permit or part thereof.

(b) The permittee shall pay an annual operating permit administrative fee according to the fee schedule established in 25 Pa. Code § 127.703(c).

(1) Two hundred fifty dollars for applications filed during the 1995-1999 calendar years.

(2) Three hundred dollars for applications filed during the 2000-2004 calendar years.

(3) Three hundred seventy-five dollars for applications filed during the years beginning in 2005.

(c) The applicable fees shall be made payable to "The Commonwealth of Pennsylvania - Clean Air Fund".

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

Transfer of Operating Permits.

(a) This operating permit may not be transferred to another person, except in cases of transfer-of-ownership that are documented and approved by the Department.

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

(c) This operating permit is valid only for those specific sources and the specific source locations described in this permit.

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

Inspection and Entry.

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

(1) Enter at reasonable times upon the permittee's premises where a source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit;

(2) Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

(3) Inspect at reasonable times, any facilities, equipment including monitoring and air pollution control equipment, practices, or operations regulated or required under this permit;

(4) Sample or monitor, at reasonable times, any substances or parameters, for the purpose of assuring compliance with the permit or applicable requirements as authorized by the Clean Air Act, the Air Pollution Control Act, or the regulations promulgated under the Acts.

(b) Pursuant to 35 P.S. § 4008, no person shall hinder, obstruct, prevent or interfere with the Department or its personnel in the performance of any duty authorized under the Air Pollution Control Act or regulations adopted thereunder including denying the Department access to a source at this facility. Refusal of entry or access may constitute grounds for permit revocation and assessment of criminal and/or civil penalties.

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

SECTION B. General State Only Requirements

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

Compliance Requirements.

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

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

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

(c) For purposes of Sub-condition (b) of this permit condition, the specifications in applications for plan approvals and operating permits are the physical configurations and engineering design details which the Department determines are essential for the permittee's compliance with the applicable requirements in this State-Only permit. Nothing in this sub-condition shall be construed to create an independent affirmative duty upon the permittee to obtain a predetermination from the Department for physical configuration or engineering design detail changes made by the permittee.

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

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

Duty to Provide Information.

(a) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of each source at the facility.

(b) The permittee shall furnish to the Department, in writing, information that the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to maintain in accordance with this permit.

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

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

- (1) The permittee constructs or operates the source subject to the operating permit so that it is in violation of the Air Pollution Control Act, the Clean Air Act, the regulations thereunder, a plan approval, a permit or in a manner that causes air pollution.
- (2) The permittee fails to properly or adequately maintain or repair an air pollution control device or equipment attached to or otherwise made a part of the source.

SECTION B. General State Only Requirements

(3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.

(4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

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

Operating Permit Modifications

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

(b) Administrative Amendments. The permittee shall make administrative operating permit amendments (as defined in 25 Pa. Code § 127.450(a)), according to procedures specified in § 127.450 unless precluded by the Clean Air Act or its regulations.

(c) Minor Operating Permit Modifications. The permittee shall make minor operating permit modifications (as defined 25 Pa. Code § 121.1) in accordance with 25 Pa. Code § 127.462.

(d) Permit modifications which do not qualify as minor permit modifications under 25 Pa. Code § 127.541 will be treated as a significant operating permit revision subject to the public notification procedures in §§ 127.424 and 127.425.

#012 [25 Pa. Code § 127.441]

Severability Clause.

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

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

(a) This permit authorizes de minimis emission increases in accordance with 25 Pa. Code § 127.449 so long as the permittee provides the Department with seven (7) days prior written notice before commencing any de minimis emissions increase. The written notice shall:

(1) Identify and describe the pollutants that will be emitted as a result of the de minimis emissions increase.

(2) Provide emission rates expressed in tons per year and in terms necessary to establish compliance consistent with any applicable requirement.

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

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

(1) Four tons of carbon monoxide from a single source during the term of the permit and 20 tons of carbon monoxide at the facility during the term of the permit.

(2) One ton of NO_x from a single source during the term of the permit and 5 tons of NO_x at the facility during the term of the permit.

(3) One and six-tenths tons of the oxides of sulfur from a single source during the term of the permit and 8.0 tons of oxides of sulfur at the facility during the term of the permit.

(4) Six-tenths of a ton of PM₁₀ from a single source during the term of the permit and 3.0 tons of PM₁₀ at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air

SECTION B. General State Only Requirements

Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

(d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:

(1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.

(2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.

(3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.

(4) Space heaters which heat by direct heat transfer.

(5) Laboratory equipment used exclusively for chemical or physical analysis.

(6) Other sources and classes of sources determined to be of minor significance by the Department.

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

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

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

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

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

(g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.

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

#014 [25 Pa. Code § 127.3]

[Operational Flexibility.](#)

The permittee is authorized to make changes within the facility in accordance with the regulatory provisions outlined

SECTION B. General State Only Requirements

in 25 Pa. Code § 127.3 (relating to operational flexibility) to implement the operational flexibility requirements provisions authorized under Section 6.1(i) of the Air Pollution Control Act and the operational flexibility terms and conditions of this permit. The provisions in 25 Pa. Code Chapter 127 which implement the operational flexibility requirements include the following:

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

#015 [25 Pa. Code § 127.11]

Reactivation

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

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

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

#017 [25 Pa. Code § 121.9]

Circumvention.

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

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

Reporting Requirements.

- (a) The permittee shall comply with the applicable reporting requirements of the Clean Air Act, the regulations thereunder, the Air Pollution Control Act and 25 Pa. Code Article III including Chapters 127, 135 and 139.

SECTION B. General State Only Requirements

(b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.

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

Regional Air Program Manager

PA Department of Environmental Protection

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

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

(e) Any records, reports or information submitted to the Department shall be available to the public except for such records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

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

Sampling, Testing and Monitoring Procedures.

(a) The permittee shall comply with the monitoring, recordkeeping or reporting requirements of 25 Pa. Code Chapter 139 and the other applicable requirements of 25 Pa. Code Article III and additional requirements related to monitoring, reporting and recordkeeping required by the Clean Air Act and the regulations thereunder including the Compliance Assurance Monitoring requirements of 40 CFR Part 64, where applicable.

(b) Unless alternative methodology is required by the Clean Air Act and regulations adopted thereunder, sampling, testing and monitoring required by or used by the permittee to demonstrate compliance with any applicable regulation or permit condition shall be conducted in accordance with the requirements of 25 Pa. Code Chapter 139.

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

Recordkeeping.

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

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

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

(c) The permittee shall maintain and make available to the Department upon request, records including computerized

**SECTION B. General State Only Requirements**

records that may be necessary to comply with the reporting, recordkeeping and emission statement requirements in 25 Pa. Code Chapter 135 (relating to reporting of sources). In accordance with 25 Pa. Code Chapter 135, § 135.5, such records may include records of production, fuel usage, maintenance of production or pollution control equipment or other information determined by the Department to be necessary for identification and quantification of potential and actual air contaminant emissions.

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

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



SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

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) Sources and classes of sources other than those identified above, 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.

002 [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 Condition #001, above, if such emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]

Limitations

a) Limitations are as follows:

- (1) If control of malodorous air contaminants is required under subsection (b), emissions shall be incinerated at a minimum of 1200F for at least 0.3 seconds prior to their emission into the outdoor atmosphere.
 - (2) Techniques other than incineration may be used to control malodorous air contaminants if such techniques are equivalent to or better than the required incineration in terms of control of the odor emissions and are approved in writing by the Department.
- 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

004 [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.

SECTION C. Site Level Requirements

(2) Equal to or greater than 60% at any time.

005 [25 Pa. Code §123.42]

Exceptions

The limitations of 25 PA Code 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 25 PA Code 123.1(a)(1) -- (9) (relating to prohibition of certain fugitive emissions).
- (4) Not applicable

II. TESTING REQUIREMENTS.

006 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The Department reserves the right to require exhaust stack testing of any source(s) as necessary to verify emissions for purposes including determining the correct emission fee, malfunctions, or determining compliance with any applicable requirements.

III. MONITORING REQUIREMENTS.

007 [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.

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

008 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall notify the Department, within seven (7) days, of deviations of Conditions #001, #002, #003 & #004, above, and the corrective action taken.

VI. WORK PRACTICE REQUIREMENTS.

009 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

A person responsible for any source specified in Condition #001, above, shall take all reasonable actions to prevent

SECTION C. Site Level Requirements

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.

010 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- a) The permittee, or authorized representative, shall conduct weekly inspections of the area inside the plant boundaries to detect the presence of fugitive emissions, malodors or visible emissions. If visible stack emissions are detected, opacity readings shall be taken and recorded in accordance with Method 9. If any visible fugitive particulate matter is detected, a determination will be made as to whether these emissions are visible beyond the plant property. A log of these inspections and any follow-up activities shall be maintained in a maintenance log and shall be made available to the Department upon request.
- b) The appropriate person shall be notified if there are any deviations from Conditions #001, #002, #003 & #004, above, and corrective actions shall be initiated to remedy the situation. The date and nature of these corrective actions shall be recorded in a maintenance log.

VII. ADDITIONAL REQUIREMENTS.

011 [25 Pa. Code §127.441]

Operating permit terms and conditions.

- a) The permittee is granted 104 ton of VOC and 21 ton of NO_x Emissions Reduction Credits (ERCs). The ERCs were generated from the shutdown of the following sources:
 1. Source # 101- Continuous Weld Furnace rated at 100 MM Btu/hr natural gas
Shutdown Date: 4/21/2006
VOC: 1.2 TPY
NO_x: 21.0 TPY
 2. Source # 104- Pipe Coating Operation
Shutdown Date: 5/11/2006
VOC: 102.8 TPY
NO_x: 0.00 TPY
- b) The permittee and any subsequent user of the credits shall comply with the requirements of 25 PA Code §127.206, §127.207 and §127.208.
- c) Pursuant to the provisions of 25 PA Code Section §127.206(f), the ERCs generated in this approval shall expire if not consumed within 10 years from the source shutdown date as shown in part (a).
- d) Wheatland Tube and any subsequent users of these credits shall comply with the requirements of 25 PA Code §127.206, §127.207 and §127.208 regarding ERC use and transfer requirements.
- e) These ERCs may be used internally or transferred to other companies after the approved entry of the ERCs by the

**SECTION C. Site Level Requirements**

Department into the Pennsylvania ERC Registry System.

f) Sources listed in part (a) shall remain permanently shutdown. If the company plans to operate the CW Furnace or coating operations in the future, the company shall submit appropriate plan approval applications. Any subsequent emissions from these sources shall comply with New Source Review (NSR) regulations in 25 PA Code §127 Subchapter E.

g) Pursuant to the provisions of 25 PA Code Section §127.207(7), if the ERC generating sources have not been dismantled or removed, the company must submit to the Department on an annual basis the verification of the continuance of the shutdown.

h) Any notification as a result of any condition herein should be directed to:

Air Quality Program Manager
Department of Environmental Protection
230 Chestnut Street
Meadville, PA 16335

012 [25 Pa. Code §129.14]

Open burning operations

a) 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.

SECTION C. Site Level Requirements

(7) A fire set solely for cooking food.

d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:

(1) As used in this subsection the following terms shall have the following meanings:

Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

Clearing and grubbing wastes -- Trees, shrubs, and other native vegetation which are cleared from land during or prior to the process of construction. The term does not include demolition wastes and dirt laden roots.

(2) Not applicable

(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.

[This permit does not constitute authorization to burn solid waste pursuant to Section 610(3) of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act.]

VIII. COMPLIANCE CERTIFICATION.

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

IX. COMPLIANCE SCHEDULE.

No compliance milestones exist.

**SECTION D. Source Level Requirements**

Source ID: 034

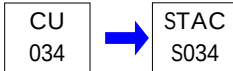
Source Name: BOILER

Source Capacity / Throughput:

2.500 MMBTU / HR

2.500 MCF / HR

Natural Gas

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

001 [25 Pa. Code §123.11]

Combustion units

(a) A person may not permit the emission into the outdoor atmosphere of particulate matter from a combustion unit in excess of the following:

(1) The rate of 0.4 pound per million Btu of heat input, when the heat input to the combustion unit in millions of Btus per hour is greater than 2.5 but less than 50.

002 [25 Pa. Code §123.22]

Combustion units

(a) Nonair basin areas. Combustion units in nonair basin areas shall conform with the following:

(1) General provision. No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from a combustion unit in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period except as provided for in paragraph (4).

Fuel Restriction(s).

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The permittee shall use only natural gas as fuel for this source.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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



SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

004 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The source shall be maintained and operated in accordance with the manufacturer's specification and in accordance with good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

Source ID: 033

Source Name: MISCELLANEOUS NATURAL GAS COMBUSTION (< 2.5 BTU / HR)

Source Capacity / Throughput:

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

001 [25 Pa. Code §123.22]

Combustion units

a) Nonair basin areas. Combustion units in nonair basin areas shall conform with the following:

(1) General provision. No person may permit the emission into the outdoor atmosphere of sulfur oxides, expressed as SO₂, from a combustion unit in excess of the rate of 4 pounds per million Btu of heat input over any 1-hour period.

[Compliance with the requirement specified in this streamlined permit condition assures compliance with the provisions specified in: SIP Approved SO₂ Limits 40 CFR 52.2020(c)(1)]

Fuel Restriction(s).

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall use only natural gas as a fuel for this source.

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The source shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.



SECTION D. Source Level Requirements

[RACT Approval: OP 43-040 Condition No. 3]

VII. ADDITIONAL REQUIREMENTS.

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

**SECTION D. Source Level Requirements**

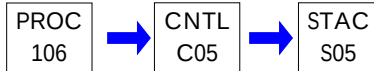
Source ID: 106

Source Name: #2 CONDUIT LINES - ZINC COATING

Source Capacity / Throughput:

5.000 Tons / HR

STEEL

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

001 [25 Pa. Code §123.13]

Processes

a) Subsections (b) and (c) apply to all processes except combustion units, incinerators and pulp mill smelt dissolving tanks.

b) Not applicable

c) For processes not listed in subsection (b)(1), including but not limited to, coke oven battery waste heat stacks and autogeneous zinc coker waste heat stacks, the following shall apply:

(1) Prohibited emissions. No person may permit the emission into the outdoor atmosphere of particulate matter from any process not listed in subsection (b)(1) in a manner that the concentration of particulate matter in the effluent gas exceeds any of the following:

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

002 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall maintain records of the following:

1. The weekly pressure drop reading across each control device
2. Maintenance performed on each control device

V. REPORTING REQUIREMENTS.

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



SECTION D. Source Level Requirements

VI. WORK PRACTICE REQUIREMENTS.

003 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

- a) The permittee shall perform weekly operational inspections of each control device. The inspection shall include, at a minimum, to monitor pressure drop across each control device while the source is in operation.
- b) The control device shall be in operation whenever the source is operating the zinc coating equipment.
- c) The source and control device shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

VII. ADDITIONAL REQUIREMENTS.

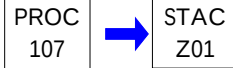
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: COLD SOLVENT CLEANERS

Source Capacity / Throughput:

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

a) The parts washer shall not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.

b) The source shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices. [RACT Approval: OP 43-040 Condition No. 3]

002 [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

SECTION D. Source Level Requirements

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.



SECTION D. Source Level Requirements

(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) Not applicable

c) Not applicable

d) Not applicable

e) Not applicable

VII. ADDITIONAL REQUIREMENTS.

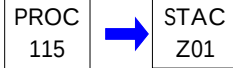
No additional requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

**SECTION D. Source Level Requirements**

Source ID: 115

Source Name: VOC STORAGE TANKS (3)

Source Capacity / Throughput:

**I. RESTRICTIONS.**

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

II. TESTING REQUIREMENTS.

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

III. MONITORING REQUIREMENTS.

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

IV. RECORDKEEPING REQUIREMENTS.

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

V. REPORTING REQUIREMENTS.

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

VI. WORK PRACTICE REQUIREMENTS.

001 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The source shall be maintained and operated in accordance with the manufacturer's specifications and in accordance with good air pollution control practices.

[RACT Approval: OP 43-040 Condition No. 3]

VII. ADDITIONAL REQUIREMENTS.

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



SECTION E. Alternative Operation Requirements.

No Alternative Operations exist for this State Only facility.

**SECTION F. Emission Restriction Summary.**

Source Id	Source Description		
034	BOILER		
Emission Limit		Pollutant	
4.000	Lbs / MMBTU	SOX	
0.400	Lbs / MMBTU	TSP	
033	MISCELLANEOUS NATURAL GAS COMBUSTION (< 2.5 BTU / HR)		
Emission Limit		Pollutant	
4.000	Lbs / MMBTU	over any 1-hour period	SOX
106	#2 CONDUIT LINES - ZINC COATING		
Emission Limit		Pollutant	
0.040	gr / DRY FT3	PM10	

Site Emission Restriction Summary

Emission Limit	Pollutant
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**SECTION G. Miscellaneous.**

- a) The Capacity / Throughput numbers listed on Page 4 and provided in Section D of this permit for individual sources are for informational purposes only and are not to be considered enforceable limits. The actual enforceable limits in the permit occur in Sections C and D of the permit. They are also summarized for informational purposes only in Section F, Emission Restriction Summary.
- b) Source ID: Department assigned ID number for the source
Source Name: Department assigned name for the source
Capacity: The maximum capacity for the source (not a limit)
Fuel / Material: The fuel / material assigned to SCC for the source
Schematics:
FML: Fuel material location
Comb: Combustion source
Proc: Process
CD: Control device
EP: Emission point
Pollutants:
P000: Particulate matter
- c) For the purpose of this permit, Source 033 (Miscellaneous Natural Gas Combustion) consists of approximately 100 various sized space heaters with the largest of these units being 200,000 btu/hr.
- d) For the purpose of this permit, Source 034 (Boiler) provides steam to the rust inhibiting oil tank (3,000 gallons) rated at 2.5 MM Btu/hr.
- e) For the purpose of this permit, Source 106 (Conduit Line-Zinc Coating) consists of one coating line.
- f) For the purpose of this permit, Source 107 (Cold Solvent Cleaners) consists of the following:
1. Water Treatment Plant (9 gallons)
 2. #2 Conduit Line (102 gallons)
 3. Millwright Shop (9 gallons)
 4. B&O Cutoff (17 gallons)
 5. Machine Shop (77 gallons)
 6. Mechanic Shop (17 gallons)
 7. Mechanic Shop (17 gallons)
 8. Oil Country Line (9 gallons)
 9. Oil Country Line (17 gallons)
 10. Oil Country Line (26 gallons)
 11. Hyrotester (77 gallons)
 12. RT Building / not in use (17 gallons)
- g) For the purpose of this permit, Source 115 (VOC Storage Tanks) consists of the following:
1. Diesel Storage Tank (500 gallons)
 2. Kerosene Storage Tank (250 gallons)
 3. Gasoline Storage Tank (250 gallons)
- h) The following sources have been modified or removed from the operating permit on or before May 26, 2006:
- Source 031 & 032 (North & South Boiler) and Stacks S31 & S32 removed
Source 033 (Natural Gas Heaters) modified from 300 units to 100 units
Source 101 (CW Furnace) and Stack S01 & S13 removed
Source 102 (#1 Galvanizing Steam Blowout), Controls C02A & C02, and Stack S02 removed
Source 103 (#2 Galvanizing Steam Blowout), Controls C03A & C03, and Stack S03 removed
Source 104 (Pipe Coating) removed

**SECTION G. Miscellaneous.**

Source 105 (Plant-Wide Solvent Use) removed
Source 106 (Conduit Lines-Zinc Coating) Line #1 & Line #3, Control C04, and Stack S04 removed
Source 107 (Cold Solvent Cleaners) changed location and reduced from 16 to 12 part washers
Source 108 (#1 Galvanizing Coating Pot) and Stack S06 removed
Source 109 (#2 Galvanizing Coating Pot) and Stack S07 removed
Source 110 (#1 Galvanizing Furnace/Superheater) and Stacks S08 & S10 removed
Source 111 (#2 Galvanizing Furnace/Superheater) and Stacks S09 & S11 removed
Source 113 (Lime Silo), Control C113 and Stack S113 removed
Source 112 (Facers and Straightners)/3 straightners, 3 pair of facers, Control C06, and Stack S12 removed
Source 114 (Emergency Generators) removed

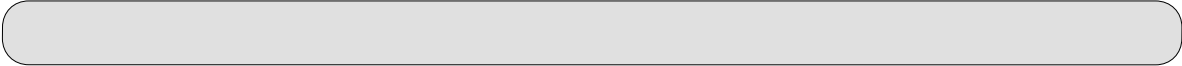
i) The following sources have minor emissions and no applicable emission, testing, monitoring, recordkeeping, or reporting requirements for this operating permit:

1. Waste Oil Storage Tank (8,000 gallons)
2. (2) Pipe Threaders (using rust-inhibiting oil with VOC emissions < 1 tpy)
3. Wastewater Treatment Plant
4. Conduit Saw
5. Conduit Threader
6. UV Coating Line
7. 3,000 gallon tank (Polar Sol 5BW- rust inhibiting oil)

j) The Lime Silo and control device remains on the facility's site. If at any time the source is re-activated, the facility will need to notify the Department before startup.

k) This Operating Permit No. 43-00040 was originally issued on July 27, 1998, effective on July 31, 1998, and expires on July 31, 2003. Revision No. 1, issued on June 4, 2002, was an administrative amendment to incorporate a change of ownership from AK Steel Corporation to Wheatland Tube Company, Division of John Maneely Company. This Operating Permit was reissued on August 13, 2003, effective on August 13, 2003, and expires on July 31, 2008. During the renewal process, incorporated RACT OP 42-040 conditions and de minimus increase. Revision No. 2, effective on September 12, 2003, was an administrative amendment to correct typographical errors associated with the CAM plan for Sources 102 & 103.

l) An Administrative Amendment was received on August 16, 2007 for the change in Responsible Official to Mr. Edward Best, Vice President of Facilities Planning. This State Only Operating Permit No. 43-00040 was reissued on December 4, 2007 and expires on November 30, 2012.



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