

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION AIR QUALITY PROGRAM

STATE ONLY OPERATING PERMIT

Issue Date: December 16, 2010 Effective Date: December 16, 2010

Expiration Date: November 30, 2015

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: 37-00290

Federal Tax Id - Plant Code: 13-4313235-1

Owner Information

Name: FERROTECH CORP Mailing Address: 526 S JEFFERSON ST

NEW CASTLE, PA 16101-3959

Plant Information

Plant: FERROTECH CORP/NEW CASTLE

Location: 37 Lawrence County 37001 New Castle City

SIC Code: 3449 Manufacturing - Miscellaneous Metal Work

Responsible Official

Name: MARK HEUSCHKEL

Title: PRESIDENT Phone: (724) 658 - 4571

Permit Contact Person

Name: JERI CRUM

Title: ACCOUNT EXECUTIVE

Phone: (724) 698 - 3181

[Signature] _____

JOHN F. GUTH, NORTHWEST REGION AIR PROGRAM MANAGER



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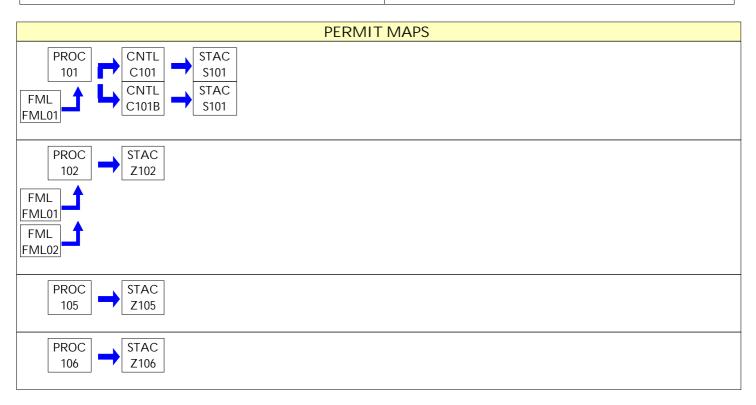
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SECTION A. Site Inventory List

Source I	D Source Name	Capacity/Throughput	Fuel/Material
101	SCRAP METAL CUTTING OPERATION	N/A	Natural Gas
		8.400 Tons/HR	SCRAP METAL
102	SCRAP CUTTING IN THE YARD	N/A	Propane
		N/A	Natural Gas
		N/A	SCRAP CUTTING
105	MISC GAS USAGE		
106	BALL DROP		
C101	SCRAP CUTTING-DUST COLLECTOR		
C101B	TORIT DF-04 DUST COLLECTOR		
FML01	NATURAL GAS PIPELINE		
FML02	PROPANE STORAGE TANKS		
S101	STACK		
Z102	FUGITIVES		
Z105	FUGITIVE EMISSIONS FROM SOURCE ID 105		
Z106	FUGITIVE EMISSIONS FROM SOURCE ID 106		





#001 [25 Pa. Code § 121.1]

Definitions.

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

#002 [25 Pa. Code § 127.446]

Operating Permit Duration.

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

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

Permit Renewal.

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

#004 [25 Pa. Code § 127.703]

Operating Permit Fees under Subchapter I.

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





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

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

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

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

Transfer of Operating Permits.

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

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

Inspection and Entry.

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



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

Compliance Requirements.

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

#008 [25 Pa. Code § 127.441]

Need to Halt or Reduce Activity Not a Defense.

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

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

Duty to Provide Information.

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

#010 [25 Pa. Code § 127.461]

Revising an Operating Permit for Cause.

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

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



- (3) The permittee has failed to submit a report required by the operating permit or an applicable regulation.
- (4) The EPA determines that the permit is not in compliance with the Clean Air Act or the regulations thereunder.

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

Operating Permit Modifications

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

#012 [25 Pa. Code § 127.441]

Severability Clause.

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

#013 [25 Pa. Code § 127.449]

De Minimis Emission Increases.

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





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

- (5) One ton of VOCs from a single source during the term of the permit and 5.0 tons of VOCs at the facility during the term of the permit. This shall include emissions of a pollutant regulated under Section 112 of the Clean Air Act unless precluded by the Clean Air Act, the regulations thereunder or 25 Pa. Code Article III.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (d) In accordance with § 127.14, the permittee is authorized to install the following minor sources without the need for a plan approval or permit modification:
- (1) Air conditioning or ventilation systems not designed to remove pollutants generated or released from other sources.
 - (2) Combustion units rated at 2,500,000 or less Btu per hour of heat input.
- (3) Combustion units with a rated capacity of less than 10,000,000 Btu per hour heat input fueled by natural gas supplied by a public utility or by commercial fuel oils which are No. 2 or lighter, viscosity less than or equal to 5.82 c St, and which meet the sulfur content requirements of 25 Pa. Code §123.22 (relating to combustion units). For purposes of this permit, commercial fuel oil shall be virgin oil which has no reprocessed, recycled or waste material added.
 - (4) Space heaters which heat by direct heat transfer.
 - (5) Laboratory equipment used exclusively for chemical or physical analysis.
 - (6) Other sources and classes of sources determined to be of minor significance by the Department.
- (e) This permit does not authorize de minimis emission increases if the emissions increase would cause one or more of the following:
- (1) Increase the emissions of a pollutant regulated under Section 112 of the Clean Air Act except as authorized in Subparagraphs (c)(4) and (5) of this permit condition.
- (2) Subject the facility to the prevention of significant deterioration requirements in 25 Pa. Code Chapter 127, Subchapter D and/or the new source review requirements in Subchapter E.
- (3) Violate any applicable requirement of this permit, the Air Pollution Control Act, the Clean Air Act, or the regulations promulgated under either of the acts.
- (f) Emissions authorized under this permit condition shall be included in the monitoring, recordkeeping and reporting requirements of this permit.
- (g) Except for de minimis emission increases, installation of minor sources made pursuant to this permit condition and Plan Approval Exemptions under 25 Pa. Code § 127.14 (relating to exemptions), the permittee is prohibited from making changes or engaging in activities that are not specifically authorized under this permit without first applying for a plan approval. In accordance with § 127.14(b), a plan approval is not required for the construction, modification, reactivation, or installation of the sources creating the de minimis emissions increase.
- (h) The permittee may not meet de minimis emission threshold levels by offsetting emission increases or decreases at the same source.

#014 [25 Pa. Code § 127.3]

Operational Flexibility.

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



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

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

#015 [25 Pa. Code § 127.11]

Reactivation

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

#016 [25 Pa. Code § 127.36]

Health Risk-based Emission Standards and Operating Practice Requirements.

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

#017 [25 Pa. Code § 121.9]

Circumvention.

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

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

Reporting Requirements.

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



- (b) The permittee shall submit reports to the Department containing information the Department may prescribe relative to the operation and maintenance of any air contamination source.
- (c) Reports, test data, monitoring data, notifications and requests for renewal of the permit shall be submitted to the:

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

- (d) Any records or information including applications, forms, or reports submitted pursuant to this permit condition shall contain a certification by a responsible official as to truth, accuracy and completeness. The certifications submitted under this permit shall require a responsible official of the facility to certify that based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate and complete.
- (e) Any records, reports or information submitted to the Department shall be available to the public except for such records, reports or information which meet the confidentiality requirements of § 4013.2 of the Air Pollution Control Act and §§ 112(d) and 114(c) of the Clean Air Act. The permittee may not request a claim of confidentiality for any emissions data generated for the facility.

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

Sampling, Testing and Monitoring Procedures.

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

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

Recordkeeping.

- (a) The permittee shall maintain and make available, upon request by the Department, the following records of monitored information:
 - (1) The date, place (as defined in the permit) and time of sampling or measurements.
 - (2) The dates the analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of the analyses.
 - (6) The operating conditions as existing at the time of sampling or measurement.
- (b) The permittee shall retain records of any required monitoring data and supporting information for at least five (5) years from the date of the monitoring, sample, measurement, report or application. Supporting information includes the calibration data and maintenance records and original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by the permit.
- (c) The permittee shall maintain and make available to the Department upon request, records including computerized



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

#021 [25 Pa. Code § 127.441(a)]

Property Rights.

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

#022 [25 Pa. Code § 127.447]

Alternative Operating Scenarios.

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



SECTION C. Site Level Requirements

I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

- (a) No person may permit the emission into the outdoor atmosphere of fugitive air contaminant from a source other than the following:
 - (1) Construction or demolition of buildings or structures.
 - (2) Grading, paving and maintenance of roads and streets.
- (3) Use of roads and streets. Emissions from material in or on trucks, railroad cars and other vehicular equipment are not considered as emissions from use of roads and streets.
 - (4) Clearing of land.
 - (5) Stockpiling of materials.
 - (6) Open burning operations.
 - (7) Not applicable.
 - (8) Not applicable.
- (9) Sources and classes of sources other than those identified in paragraphs (1)-(8), for which the operator has obtained a determination from the Department that fugitive emissions from the source, after appropriate control, meet the following requirements:
 - (i) the emissions are of minor significance with respect to causing air pollution; and
- (ii) the emissions are not preventing or interfering with the attainment or maintenance of any ambient air quality standard.
- (b) Not applicable
- (c) [See Workpractice Requirements]

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 Section C, Condition #001 (relating to prohibition of certain fugitive emissions) if such emissions are visible at the point the emissions pass outside the person's property.

003 [25 Pa. Code §123.31]

Limitations

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.

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 §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 Section C, Condition #001 (relating to prohibition of certain fugitive emissions).
 - (4) Not applicable.

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.

006 [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.

007 [25 Pa. Code §127.511]

Monitoring and related recordkeeping and reporting requirements.

The permittee shall conduct daily inspections of this facility, when this source is in operation, to determine the presence of fugitive and/or malodorous air emissions detectable beyond the boundaries of this facility.

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.

008 [25 Pa. Code §123.1]

Prohibition of certain fugitive emissions

[From 25 Pa. Code §123.1(c)]





SECTION C. Site Level Requirements

A person responsible for any source specified in Section C, Condition #001 shall take all reasonable actions to prevent particulate matter from becoming airborne. These actions shall include, but not be limited to, the following:

- (1) Use, where possible, of water or chemicals for control of dust in the demolition of buildings or structures, construction operations, the grading of roads, or the clearing of land.
- (2) Application of asphalt, oil, water or suitable chemicals on dirt roads, material stockpiles and other surfaces which may give rise to airborne dusts.
 - (3) Paving and maintenance of roadways.
- (4) Prompt removal of earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.
- # 009 [25 Pa. Code §129.14]

Open burning operations

- (a) Air basins. No person may permit the open burning of material in an air basin.
- (b) Not applicable.
- (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) Not applicable.
 - (5) Not applicable.
 - (6) A fire set solely for recreational or ceremonial purposes.
 - (7) A fire set solely for cooking food.
 - (d) Clearing and grubbing wastes. The following is applicable to clearing and grubbing wastes:
 - (1) As used in this subsection the following terms shall have the following meanings:

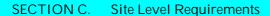
Air curtain destructor -- A mechanical device which forcefully projects a curtain of air across a pit in which open burning is being conducted so that combustion efficiency is increased and smoke and other particulate matter are contained.

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

- (2) Subsection (a) notwithstanding, clearing and grubbing wastes may be burned in a basin subject to the following requirements:
 - (i) Air curtain destructors shall be used when burning clearing and grubbing wastes.



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- (ii) Each proposed use of air curtain destructors shall be reviewed and approved by the Department in writing with respect to equipment arrangement, design and existing environmental conditions prior to commencement of burning. Proposals approved under this subparagraph need not obtain plan approval or operating permits under Chapter 127 (relating to construction modification, reactivation and operation of sources).
- (iii) Approval for use of an air curtain destructor at one site may be granted for a specified period not to exceed 3 months, but may be extended for additional limited periods upon further approval by the Department.
- (iv) The Department reserves the right to rescind approval granted if a determination by the Department indicates that an air pollution problem exists.
 - (3) Not applicable.
- (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, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 35 P.S. Section 6018.610(3), or any other provision of the Solid Waste Management Act, 4018.610(3), or any other provision of the Solid Waste Management Act, 4018.610(3), or any other provision of the Solid Waste Management Act, 4018.610(3), or any other provision of the Solid Waste Management Act, 4018.610(3), or any other provision of the Solid Waste Management Act, 4018.610(3), or any other provision of the Solid Waste Management Act, 4018.610(3), or any other provision of the Solid Waste Management Act, 4018.610(3), or any other provision of the Solid Waste Management Act, 4018.610(3), or any other provision of the Solid Waste Management Act, 4018.610(3), or any other provision of the Solid Waste Management Act, 4018.610(3), or any other provision of the Solid Waste Management Act, 4018.610(3), or

VII. ADDITIONAL REQUIREMENTS.

010 [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.

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).

COMPLIANCE SCHEDULE.

#011 16-DEC-10

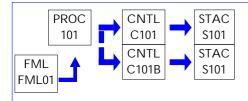
Within 30-days of the issuance date of this operating permit, the permittee shall submit to the Department RFDs for the Shredder Operation and the Fluff Pile.



Source ID: 101 Source Name: SCRAP METAL CUTTING OPERATION

Source Capacity/Throughput: N/A Natural Gas

8.400 Tons/HR SCRAP METAL



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- a. Particulate matter emissions from the collection devices shall not exceed 1.61 tons per year on an average rolling sum.
- b. Particulate matter emissions from the baghouse collection devices shall not exceed 0.01 grain/dscf.

[From Plan Approval # 37-290F, Condition #003. Compliance with the requirement in this streamlined permit condition assures compliance with the provisions found in 25 Pa. Code §123.13.]

Fuel Restriction(s).

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Pipeline quality natural gas shall be the only fuel permitted for combustion in the torch.

[This fuel restriction streamlines out the sulfur oxides emission limitation in 25 PA Code 123.21.]

[From Plan Approval Number 37-290F, Condition #004]

Throughput Restriction(s).

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Natural gas usage through the torch shall be limited to 5,530,000 cubic feet on a yearly basis, calculated as a 12 month rolling sum.

[From Plan Approval Number 37-290F, Condition #005]

II. TESTING REQUIREMENTS.

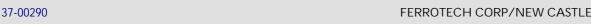
No additional testing requirements exist except as provided in other sections of this permit including Section B (State Only General Requirements).

III. MONITORING REQUIREMENTS.

004 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) The pressure drop across the air pollution control devices shall be recorded daily and measured in inches of water.
- (b) A minimum of once per shift, during daylight hours, when torch cutting operations are in progress, the permittee shall monitor the perimeter of the facility for any fugitive emissions.



[From Plan Approval Number 37-290F, Condition #007]

005 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Natural gas usage through the torch shall be recorded and calculated on a monthly basis.

[From Plan Approval Number 37-290F, Condition #008]

IV. RECORDKEEPING REQUIREMENTS.

006 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

- (a) The permittee shall retain records of the following:
 - i. Daily pressure drop readings
 - ii. Results of required fugitive emissions monitoring, including any corrective actions taken
 - iii. Preventative maintenance logs
 - iv. Weekly operational inspections
- (b) All required record keeping shall commence upon issuance of the Plan Approval. All required records shall be maintained on site for a period of five years and shall be made available to the Department upon request.

[From Plan Approval Number 37-290F, Condition #009]

007 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Natural gas usage records shall be retained for a period a five (5) years and made available to the Department upon request.

[From Plan Approval Number 37-290F, Condition #010]

V. REPORTING REQUIREMENTS.

008 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall, within an hour of occurrence, notify the Department of any malfunction of the source or associated air cleaning device which results in, or may possibly result in the emission of air contaminants from the stack of the control device in excess of the permitted limitations. Within seven days the permittee shall submit a written report of the event and corrective actions.

VI. WORK PRACTICE REQUIREMENTS.

009 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The facility shall maintain sufficient replacement cartridges, defined as 20% of the total number of cartridges, for each dust collection system onsite.

010 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Only one torch at a time shall be used to perform scrap cutting operations controlled by the two control devices inside the building. If the permittee wants to operate two torches, the control devices shall be tested for particulate matter capture efficiency to insure the two baghouses can effectively capture the additional particulate matter loading. Department approval is required to use two torches at the same time. Correspondance shall be submitted to:



New Source Review Chief Northwest Regional Office Bureau of Air Quality Control 230 Chestnut Street Meadville, PA 16335

[From Plan Approval Number 37-290F, Condition #017]

011 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall perform a daily operational inspection of the control devices that will include but not be limited to mechanical integrity of the device(s) and the presence of visible emissions from the control device(s).

[Combined from Plan Approval Number 37-290F, Condition #018 of & Operating Permit Number 37-00290, Condition #016]

012 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The torch cutting operation shall take place within six feet of the hood confines. Scrap cutting shall only be performed when the baghouses are operating.

[From Plan Approval Number 37-290F, Condition #012]

013 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall install, maintain and operate a magnehelic pressure gauge (or equivalent) at a conveniently readable location to measure the pressure drop across each collection device.

[From Plan Approval Number 37-290F, Condition #013]

014 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

If torch cutting is creating fugitive emissions for any reason, torch cutting operations shall be modified or suspended immediately to eliminate fugitive emissions .

[From Plan Approval Number 37-290F, Condition #014]

015 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

A person may not cause or permit the operation of this source in a manner inconsistent with good operating practices and good air pollution control practices.

[From Plan Approval Number 37-290F, Condition #015]

016 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

The permittee shall maintain an operating pressure drop range of 3.0 to 7.0 inches of water, gauge pressure, across each control device.

[From Plan Approval Number 37-290F, Condition #016]

017 [25 Pa. Code §127.441]



Operating permit terms and conditions.

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. A copy of the manufacturer's specifications shall be kept on site and made available to the Department upon request.

VII. ADDITIONAL REQUIREMENTS.

018 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty (20%) of full scale.

[From Plan Approval # 37-290F, Condition #019]

019 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

If fugitive emissions are observed, the Department may require the company to install additional and/or modify collection devices and/or operational procedures.

[From Plan Approval Number 37-290F, Condition #020]

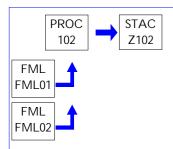


Source ID: 102 Source Name: SCRAP CUTTING IN THE YARD

Source Capacity/Throughput: N/A Propane

N/A Natural Gas

N/A SCRAP CUTTING



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

Cutting of carbon steel and rail containing minimal amounts of nickel and chrome outside of the hood with oxygen/propane torches shall be permitted.

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.

002 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

If scrap cutting is allowing fugitive emissions for any reason, scrap cutting operations shall be modified immediately to eliminate fugitive emissions or suspended.

003 [25 Pa. Code §127.12b]

Plan approval terms and conditions.

A person may not cause or permit the operation of this source in a manner inconsistent with good operating practices.





SECTION D.

Source Level Requirements



VII. ADDITIONAL REQUIREMENTS.

004 [25 Pa. Code §127.12b]

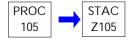
Plan approval terms and conditions.

If fugitive emissions are observed, the Department shall require additional or revised collection devices and/or operation.



Source ID: 105 Source Name: MISC GAS USAGE

Source Capacity/Throughput:



I. RESTRICTIONS.

Emission Restriction(s).

001 [25 Pa. Code §123.13]

Processes

No person may permit the emission into the outdoor atmosphere of particulate matter from this source in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

002 [25 Pa. Code §123.21]

General

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this source in a manner that the concentration of the sulfur oxides, expressed as SO2, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

II. TESTING REQUIREMENTS.

No additional testing requirements exist except as provided in other sections of this permit including Section B (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.

A person may not cause or permit the operation of this source in a manner inconsistent with good operating practices and good air pollution control practices.

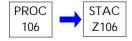
VII. ADDITIONAL REQUIREMENTS.

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



Source ID: 106 Source Name: BALL DROP

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.

This source is to be operated in a manner so as to minimize the generation of fugitive particulate matter emissions.

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.

DEP Auth ID: 779444







SECTION F. Emission Restriction Summary.

Source Id	Source Description				
101	SCRAP METAL CUTTING OPERATION				
Emission Limit			Pollutant		
0.010	gr/DRY FT3		TSP		
1.610	Tons/Yr	12-month rolling total	TSP		
105	MISC GAS USAGE				
Emission Limit			Pollutant		
500.000	PPMV		SOX		
0.040	gr/DRY FT3		TSP		

Site Emission Restriction Summary

Emission Limit	Pollutant





SECTION G. Miscellaneous.

- (a) This Operating Permit #37-00290 was originally issued on June 23, 2004, effective immediately and expires on May 31, 2009.
- (b) This Operating Permit #37-00290 was administratively amended on December 22, 2005 for a change in ownership from Industrial Concern Inc. to Ferotech Corporation.
- (c) This Operating Permit was re-issued effective December 16, 2010.



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