



**AIR QUALITY PROGRAM**  
**836 Fulton Street**  
**Pittsburgh, PA 15233-2124**

**Minor Source/Minor Modification**  
**INSTALLATION PERMIT**

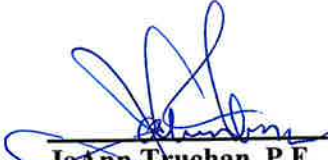
**Issued To:** ATI Flat Rolled  
Products Holdings, LLC.  
100 River Road  
Brackenridge, PA 15014-1597

**ACHD Permit#:** 0059-I006c

**Date of Issuance:** June 21, 2024

**Expiration Date:** (See Section III.12)

**Issued By:**

  
JoAnn Truchan, P.E.  
Program Manager, Engineering

**Prepared By:**

  
Michael Dorman  
Air Quality Engineer

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### *AMENDMENTS:*

<i>DATE</i>	<i>SECTION(S)</i>
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## I. CONTACT INFORMATION

**Facility Location:** **ATI Flat Rolled Products Holdings, LLC**  
100 River Road  
Brackenridge, PA 15014-1597

**Permittee/Owner:** **ATI Flat Rolled Products Holdings, LLC**  
100 River Road  
Brackenridge, PA 15014-1597

**Permittee/Operator:**  
**(if not Owner)**

**Responsible Official:** **Deborah Calderazzo**  
**Title:** Director, EHS  
**Company:** ATI Flat Rolled Products Holdings, LLC  
**Address:** 100 River Road  
Brackenridge, PA 15014-1597

**Telephone Number:** (724) 226-5947  
**E-mail Address:** [Deborah.Calderazzo@ATIMaterials.com](mailto:Deborah.Calderazzo@ATIMaterials.com)

**Facility Contact:** **Deborah Calderazzo**  
**Title:** Director, EHS  
**Telephone Number:** (724) 226-5947  
**E-mail Address:** [Deborah.Calderazzo@ATIMaterials.com](mailto:Deborah.Calderazzo@ATIMaterials.com)

### AGENCY ADDRESSES:

**ACHD Contact:** **Program Manager, Engineering**  
**Allegheny County Health Department**  
Air Quality Program  
836 Fulton Street  
Pittsburgh, PA 15233-2124  
[aqpermits@alleghenycounty.us](mailto:aqpermits@alleghenycounty.us)

**EPA Contact:** **ECAD – Air Section**  
**Environmental Protection Agency**  
Four Penn Center  
1600 John F. Kennedy Boulevard  
Mail Code 3ED21  
Philadelphia, PA 19103-2029

## II. FACILITY DESCRIPTION

### FACILITY DESCRIPTION

The ATI Flat Rolled Products Holdings, LLC (ATI) Brackenridge, PA facility is a primary steel manufacturer which produces specialty products from scrap, lime, and fluxes.

The Brackenridge Plant operates two electric arc furnaces that melt specialty materials for subsequent refining in an argon-oxygen decarburization (AOD) vessel which feeds a continuous caster. The AOD is permitted to produce 600,000 tons of product annually. Slabs and ingots are presently conditioned, reheated and hot rolled on a reversing roughing mill followed by a seven-stand hot finishing mill co-located at the Brackenridge Plant. The Brackenridge Plant also has two annealing and pickling operations, as well as various cold rolling and slitting operations.

The facility is a major source (as defined in Article XXI §2101.02) for particulate matter (PM), particulate matter of 10 microns or less in diameter (PM<sub>10</sub>), particulate matter of 2.5 microns or less in diameter (PM<sub>2.5</sub>), volatile organic compounds (VOCs), nitrogen oxides (NO<sub>x</sub>), and carbon monoxide (CO) and a minor source for sulfur oxides (SO<sub>x</sub>) and hazardous air pollutants (HAPs) as defined in section 2101.20 of Article XXI.

### INSTALLATION DESCRIPTION

This permit is for the modification of the following:

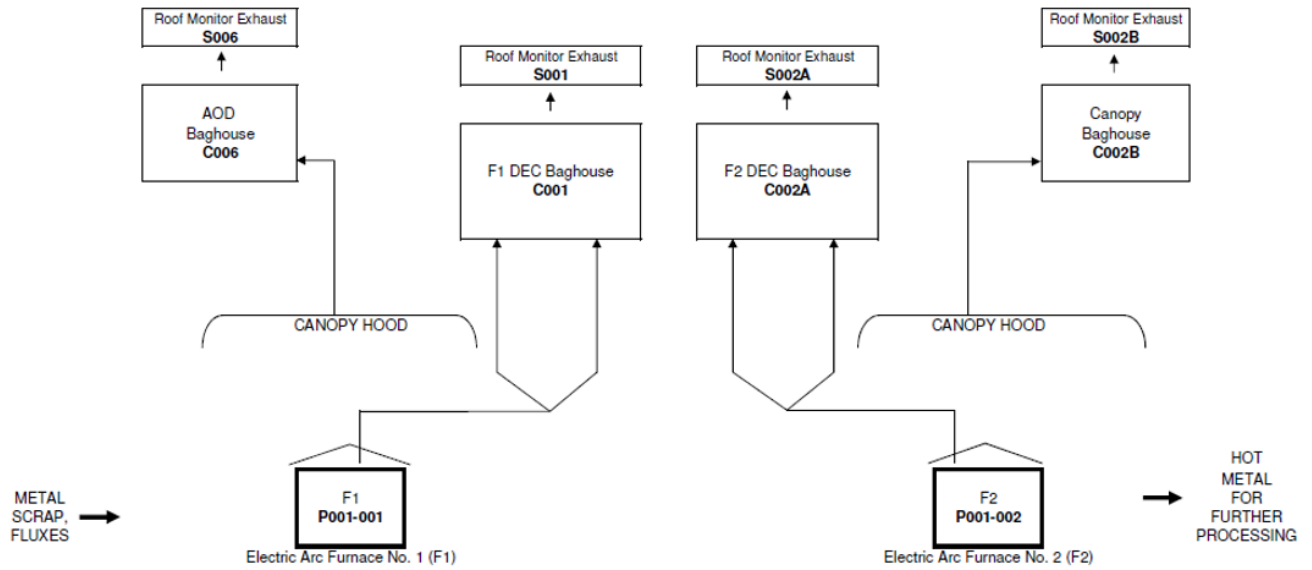
1. Emissions limits for SO<sub>x</sub> and NO<sub>x</sub> for the F1 and F2 DEC baghouses; and
2. Emission limits for SO<sub>x</sub>, NO<sub>x</sub>, CO, and VOCs for the canopy (C002B) baghouse and the AOD/canopy (C006) baghouse.

The emission units regulated by this permit are summarized in Table II-1:

**TABLE II-1: Emission Unit Identification**

I.D.	SOURCE DESCRIPTION	CONTROL DEVICE(S)	MAXIMUM CAPACITY	FUEL/RAW MATERIAL	STACK I.D.
P-001	F1 EAF	Baghouse	536,267 tons per year combined	Scrap, Lime, Fluxes	S001, S006
P-001	F2 EAF	Baghouse		Scrap, Lime, Fluxes	S002A, S002B
P-002	F1 Cooling Tower	None	12,000 gal/min	Water	
P-002	F2 Cooling Tower	None	12,000 gal/min	Water	

Flow Diagram



### ***DECLARATION OF POLICY***

*Pollution prevention is recognized as the preferred strategy (over pollution control) for reducing risk to air resources. Accordingly, pollution prevention measures should be integrated into air pollution control programs wherever possible, and the adoption by sources of cost-effective compliance strategies, incorporating pollution prevention, is encouraged. The Department will give expedited consideration to any permit modification request based on pollution prevention principles.*

**The permittee is subject to the terms and conditions set forth below. These terms and conditions constitute provisions of Allegheny County Health Department Rules and Regulations, Article XXI Air Pollution Control. The subject equipment has been conditionally approved for operation. The equipment shall be operated in conformity with the plans, specifications, conditions, and instructions which are part of your application, and may be periodically inspected for compliance by the Department. In the event that the terms and conditions of this permit or the applicable provisions of Article XXI conflict with the application for this permit, these terms and conditions and the applicable provisions of Article XXI shall prevail. Additionally, nothing in this permit relieves the permittee from the obligation to comply with all applicable Federal, State and Local laws and regulations.**

### **III. GENERAL CONDITIONS**

#### **1. Prohibition of Air Pollution (§2101.11)**

- a. It shall be a violation of this permit to fail to comply with, or to cause or assist in the violation of, any requirement of this permit, or any order or permit issued pursuant to authority granted by Article XXI. The permittee shall not willfully, negligently, or through the failure to provide and operate necessary control equipment or to take necessary precautions, operate any source of air contaminants in such manner that emissions from such source:
  - 1) Exceed the amounts permitted by this permit or by any order or permit issued pursuant to Article XXI;
  - 2) Cause an exceedance of the ambient air quality standards established by Article XXI §2101.10;  
or
  - 3) May reasonably be anticipated to endanger the public health, safety, or welfare.
- b. It shall be a violation of this permit to operate, or allow to be operated, any source in such manner as to allow the release of air contaminants into the open air or to cause air pollution as defined in Article XXI, except as is explicitly permitted by this permit or Article XXI.

#### **2. Nuisances (§2101.13)**

Any violation of any requirement of this Permit shall constitute a nuisance.

#### **3. Definitions (§2101.20)**

- a. Except as specifically provided in this permit, terms used retain the meaning accorded them under the applicable provisions and requirements of Article XXI or the applicable federal or state regulation. Whenever used in this permit, or in any action taken pursuant to this permit, the words and phrases shall have the meanings stated, unless the context clearly indicates otherwise.

- b. Unless specified otherwise in this permit or in the applicable regulation, the term “*year*” shall mean any twelve (12) consecutive months.

**4. Certification (§2102.01)**

Any report or compliance certification submitted under this permit shall contain written certification by a responsible official as to truth, accuracy, and completeness. This certification and any other certification required under this permit shall be signed by a responsible official of the source, and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**5. Operation and Maintenance (§2105.03)**

All air pollution control equipment required by this permit or Article XXI, and all equivalent compliance techniques that have been approved by the Department, shall be properly installed, maintained, and operated consistent with good air pollution control practice.

**6. Conditions (§2102.03.c)**

It shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02, for any person to fail to comply with any terms or conditions set forth in this permit.

**7. Transfers (§2102.03.e)**

This permit shall not be transferable from one person to another, except in accordance with Article XXI §2102.03.e and in cases of change-in-ownership which are documented to the satisfaction of the Department, and shall be valid only for the specific sources and equipment for which this permit was issued. The transfer of permits in the case of change-in-ownership may be made consistent with the administrative permit amendment procedure of Article XXI §2103.14.b.

**8. Effect (§2102.03.g)**

Issuance of this permit shall not in any manner relieve any person of the duty to fully comply with the requirements of Article XXI or any other provision of law, nor shall it in any manner preclude or affect the right of the Department to initiate any enforcement action whatsoever for violations of Article XXI or this Permit, whether occurring before or after the issuance of such permit. Further, the issuance of this permit shall not be a defense to any nuisance action, nor shall such permit be construed as a certificate of compliance with the requirements of Article XXI or this Permit.

**9. General Requirements (§2102.04.a)**

It shall be a violation of this Permit giving rise to the remedies set forth in Article XXI §2109 for any person to install, modify, replace, reconstruct, or reactivate any source or air pollution control equipment to which this Permit applies unless either:

- a. The Department has first issued an Installation Permit for such source or equipment; or
- b. Such action is solely a reactivation of a source with a current Operating Permit, which is approved under §2103.13 of Article XXI.



**10. Conditions (§2102.04.e)**

Further, the initiation of installation, modification, replacement, reconstruction, or reactivation under this Installation Permit and any reactivation plan shall be deemed acceptance by the source of all terms and conditions specified by the Department in this permit and plan.

**11. Revocation (§2102.04.f)**

- a. The Department may, at any time, revoke this Installation Permit if it finds that:
  - 1) Any statement made in the permit application is not true, or that material information has not been disclosed in the application;
  - 2) The source is not being installed, modified, replaced, reconstructed, or reactivated in the manner indicated by this permit or applicable reactivation plan;
  - 3) Air contaminants will not be controlled to the degree indicated by this permit;
  - 4) Any term or condition of this permit has not been complied with;
  - 5) The Department has been denied lawful access to the premises or records, charts, instruments and the like as authorized by this Permit; or
- b. Prior to the date on which construction of the proposed source has commenced the Department may, revoke this Installation Permit if a significantly better air pollution control technology has become available for such source, a more stringent regulation applicable to such source has been adopted, or any other change has occurred which requires a more stringent degree of control of air contaminants.

**12. Term (§2102.04.g)**

This Installation Permit shall expire in 18 months if construction has not commenced within such period or shall expire 18 months after such construction has been suspended, if construction is not resumed within such period. Installation Permits shall authorize temporary operation to facilitate shakedown of sources and air cleaning devices, to permit operations pending issuance of a related subsequent Operating Permit, or to permit the evaluation of the air contamination aspects of the source. Such temporary operation period shall be valid for a limited time, not to exceed 180 days, but may be extended for additional limited periods, each not to exceed 120 days, except that no temporary operation shall be authorized or extended which may circumvent the requirements of Article XXI.

For major sources, if the construction, modification or installation is not commenced within 18 months of the issuance of an installation permit or if there is more than an 18-month lapse in construction, modification, or installation, a new installation permit application shall be submitted. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified. An applicant for an extension of an installation permit shall pay a fee in the amount set by the Board of Health and approved by Allegheny County Council. The fee for an extension of an installation permit will not apply if, through no fault of the applicant, an extension is required.

**13. Prohibition of Operating Without a Permit (§2103.10.b.1)**

Except as otherwise expressly provided under Article XXI §2103.10, no source may be operated, or allowed to operate, after the time a complete Operating Permit application for such source is required to be submitted under §2103.10, except in compliance with an Operating Permit issued under §2103.10.

**14. Severability Requirement (§2103.12.l)**

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

**15. Reporting Requirements (§2103.12.k)**

- a. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the Responsible Official.
- b. Prompt reporting of deviations from permit requirements is required, including those attributable to upset conditions as defined in this permit and Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.
- c. All reports submitted to the Department shall comply with the certification requirements of General Condition III.4 above.
- d. Semiannual reports required by this permit shall be submitted to the Department as follows:
  - 1) One semiannual report is due by July 31<sup>st</sup> of each year for the time period beginning January 1<sup>st</sup> and ending June 30<sup>th</sup> of the current year.
  - 2) One semiannual report is due by February 1<sup>st</sup> of each year for the time period beginning July 1<sup>st</sup> and ending December 31<sup>st</sup> of the previous year.
- e. Reports should be submitted online through the ACHD Air Quality Regulated Entities Portal (REP). If REP is not available, written notice should be sent to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us).

**16. Minor Modifications of an Installation Permit (§2102.10.c)**

Modifications to this Installation Permits may be applied for but only upon submission of an application with a fee paid and where:

- a. No reassessment of any control technology determination is required;
- b. No reassessment of any ambient air quality impact is required; and
- c. There is no increase in emissions; and
- d. The applicable requirements of §2102.04.j, “Miscellaneous Notice Requirements,” are met.

The fee amount shall be set by the Board of Health.

**17. Violations (§2104.06)**

The violation of any emission standard established by this Permit shall be a violation of this Permit giving rise to the remedies provided by Article XXI §2109.02.

**18. Other Requirements Not Affected (§2105.02)**

Compliance with the requirements of this permit shall not in any manner relieve any person from the duty to fully comply with any other applicable federal, state, or county statute, rule, regulation, or the like, including, but not limited to, any applicable NSPSs, NESHAPs, MACTs, or Generally Achievable Control Technology standards now or hereafter established by the EPA, and any applicable requirement of BACT or LAER as provided by Article XXI, any condition contained in this Installation Permit and/or any additional or more stringent requirements contained in an order issued to such person pursuant to Part I of Article XXI.

**19. Other Rights and Remedies Preserved (§2109.02.b)**

Nothing in this permit shall be construed as impairing any right or remedy now existing or hereafter created in equity, common law or statutory law with respect to air pollution, nor shall any court be deprived of such jurisdiction for the reason that such air pollution constitutes a violation of this permit

**20. Penalties, Fines, and Interest (§2109.07.a)**

A source that fails to pay any fee required under this Permit or article XXI when due shall pay a civil penalty of 50% of the fee amount, plus interest on the fee amount computed in accordance with of Article XXI §2109.06.a.4 from the date the fee was required to be paid. In addition, the source may have its permit revoked.

**21. Appeals (§2109.10)**

In accordance with State Law and County regulations and ordinances, any person aggrieved by an order or other final action of the Department issued pursuant to Article XXI shall have the right to appeal the action to the Director in accordance with the applicable County regulations and ordinances.

## IV. SITE LEVEL TERMS AND CONDITIONS

### 1. Reporting of Upset Conditions (§2103.12.k.2)

The permittee shall promptly report all deviations from permit requirements, including those attributable to upset conditions as defined in Article XXI §2108.01.c, the probable cause of such deviations, and any corrective actions or preventive measures taken.

### 2. Visible Emissions (§2104.01.a)

Except as provided for by Article XXI §2108.01.d pertaining to a cold start, the permittee shall not operate, or allow to be operated, any source in such manner that the opacity of visible emissions from a flue or process fugitive emissions from such source, excluding uncombined water:

- a. Equal or exceed an opacity of 20% for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period; or,
- b. Equal or exceed an opacity of 60% at any time.

### 3. Odor Emissions (§2104.04) (County-only enforceable)

No person shall operate, or allow to be operated, any source in such manner that emissions of malodorous matter from such source are perceptible beyond the property line of such source. In addition, the Department may pursue the remedies provided by §2109.02 for any violation of this Section.

### 4. Materials Handling (§2104.05)

The permittee shall not conduct, or allow to be conducted, any materials handling operation in such manner that emissions from such operation are visible at or beyond the property line.

### 5. Open Burning (§2105.50)

The permittee shall not conduct, or allow to be conducted, the open burning of any material, except where the Department has issued an Open Burning Permit to the permittee in accordance with Article XXI §2105.50 or where the open burning is conducted solely for the purpose of non-commercial preparation of food for human consumption, recreation, light, ornament, or provision of warmth for outside workers, and in a manner which contributes a negligible amount of air contaminants.

### 6. Shutdown of Control Equipment (§2108.01.b)

- a. In the event any air pollution control equipment is shut down for reasons other than a breakdown, the permittee shall report, in writing, to the Department the intent to shut down such equipment at least 24 hours prior to the planned shutdown. Notwithstanding the submission of such report, the equipment shall not be shut down until the approval of the Department is obtained; provided, however, that no such report shall be required if the source(s) served by such air pollution control equipment is also shut down at all times that such equipment is shut down.

- b. The Department shall act on all requested shutdowns as promptly as possible. If the Department does not take action on such requests within ten (10) calendar days of receipt of the notice, the request shall be deemed denied, and upon request, the owner or operator of the affected source shall have a right to appeal in accordance with the provisions of Article XI.
- c. The prior report required by Site Level Condition IV.6.a above shall include:
  - 1) Identification of the specific equipment to be shut down, its location and permit number (if permitted), together with an identification of the source(s) affected;
  - 2) The reasons for the shutdown;
  - 3) The expected length of time that the equipment will be out of service;
  - 4) Identification of the nature and quantity of emissions likely to occur during the shutdown;
  - 5) Measures, including extra labor and equipment, which will be taken to minimize the length of the shutdown, the amount of air contaminants emitted, or the ambient effects of the emissions.
  - 6) Measures which will be taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impracticable to shut down or curtail the affected source(s) during the shutdown; and
  - 7) Such other information as may be required by the Department.
- d. Written notice required by this condition should be submitted online through the ACHD Air Quality Regulated Entities Portal (REP). If REP is not available, written notice should be sent to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us).

**7. Breakdowns (§2108.01.c)**

- a. In the event that any air pollution control equipment, process equipment, or other source of air contaminants breaks down in such manner as to have a substantial likelihood of causing the emission of air contaminants in violation of this permit, or of causing the emission into the open air of potentially toxic or hazardous materials, the permittee shall immediately, but in no event later than sixty (60) minutes after the commencement of the breakdown, notify the Department of such breakdown and shall, as expeditiously as possible but in no event later than seven (7) days after the original notification, provide written notice to the Department.
- b. To the maximum extent possible, all oral and written notices required shall include all pertinent facts, including:
  - 1) Identification of the specific equipment which has broken down, its location and permit number (if permitted), together with an identification of all related devices, equipment, and other sources which will be affected.
  - 2) The nature and probable cause of the breakdown.
  - 3) The expected length of time that the equipment will be inoperable or that the emissions will continue.
  - 4) Identification of the specific material(s) which are being, or are likely to be emitted, together with a statement concerning its toxic qualities, including its qualities as an irritant, and its potential for causing illness, disability, or mortality.
  - 5) The estimated quantity of each material being or likely to be emitted.
  - 6) Measures, including extra labor and equipment, taken or to be taken to minimize the length of the breakdown, the amount of air contaminants emitted, or the ambient effects of the emissions, together with an implementation schedule.

- 7) Measures being taken to shut down or curtail the affected source(s) or the reasons why it is impossible or impractical to shut down the source(s), or any part thereof, during the breakdown.
- c. Notices required shall be updated, in writing, as needed to advise the Department of changes in the information contained therein. In addition, any changes concerning potentially toxic or hazardous emissions shall be reported immediately. All additional information requested by the Department shall be submitted as expeditiously as practicable.
  - d. Unless otherwise directed by the Department, the Department shall be notified whenever the condition causing the breakdown is corrected or the equipment or other source is placed back in operation by no later than 9:00 AM on the next County business day. Within seven (7) days thereafter, written notice shall be submitted pursuant to Paragraphs a and b above.
  - e. Breakdown reporting shall not apply to breakdowns of air pollution control equipment which occur during the initial startup of said equipment, provided that emissions resulting from the breakdown are of the same nature and quantity as the emissions occurring prior to startup of the air pollution control equipment.
  - f. In no case shall the reporting of a breakdown prevent prosecution for any violation of this permit or Article XXI.
  - g. Written notice required by this condition should be submitted online through the ACHD Air Quality Regulated Entities Portal (REP). If REP is not available, written notice should be sent to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us).

#### 8. Cold Start (§2108.01.d)

In the event of a cold start on any fuel-burning or combustion equipment, except stationary internal combustion engines and combustion turbines used by utilities to meet peak load demands, the permittee shall report in writing to the Department the intent to perform such cold start at least 24 hours prior to the planned cold start. Such report shall identify the equipment and fuel(s) involved and shall include the expected time and duration of the startup. Upon written application from the person responsible for fuel-burning or combustion equipment which is routinely used to meet peak load demands and which is shown by experience not to be excessively emissive during a cold start, the Department may waive these requirements and may instead require periodic reports listing all cold starts which occurred during the report period. The Department shall make such waiver in writing, specifying such terms and conditions as are appropriate to achieve the purposes of Article XXI. Such waiver may be terminated by the Department at any time by written notice to the applicant. Cold start notifications should be submitted online through the ACHD Air Quality Regulated Entities Portal (REP). If REP is not available, written notice should be sent to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us).

#### 9. Emissions Inventory Statements (§2108.01.e & g)

- a. Emissions inventory statements in accordance with §2108.01.e shall be submitted to the Department by March 15 of each year for the preceding calendar year. The Department may require more frequent submittals if the Department determines that more frequent submissions are required by the EPA or that analysis of the data on a more frequent basis is necessary to implement the requirements of Article XXI or the Clean Air Act.

- b. The failure to submit any report or update within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

#### 10. Orders (§2108.01.f)

In addition to meeting the requirements Site Level Conditions IV.6 through IV.9, inclusive, the permittee shall, upon order by the Department, report to the Department such information as the Department may require in order to assess the actual and potential contribution of the source to air quality. The order shall specify a reasonable time in which to make such a report.

#### 11. Violations (§2108.01.g)

The failure to submit any report or update thereof required by Site Level Conditions IV.6 through IV.10 above, inclusive, within the time specified, the knowing submission of false information, or the willful failure to submit a complete report shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

#### 12. Emissions Testing (§2108.02)

- a. **New and Modified Sources:** No later than 60 days after achieving full production or 120 days after startup, whichever is earlier, the permittee shall conduct, or cause to be conducted, such emissions tests as are specified by the Department to demonstrate compliance with the applicable requirements of this permit and shall submit the results of such tests to the Department in writing. Upon written application setting forth all information necessary to evaluate the application, the Department may, for good cause shown, extend the time for conducting such tests beyond 120 days after startup but shall not extend the time beyond 60 days after achieving full production. Emissions testing shall comply with all applicable requirements of Article XXI, §2108.02.e.
- b. **Tests by the Department:** Notwithstanding any tests conducted pursuant to this permit, the Department or another entity designated by the Department may conduct emissions testing on any source or air pollution control equipment. At the request of the Department, the permittee shall provide adequate sampling ports, safe sampling platforms and adequate utilities for the performance of such tests.
- c. **Testing Requirements:** No later than 45 days prior to conducting any tests required by this permit, the permittee shall submit for the Department's approval a written test protocol explaining the intended testing plan, including any deviations from standard testing procedures, the proposed operating conditions of the source during the test, calibration data for specific test equipment and a demonstration that the tests will be conducted under the direct supervision of persons qualified by training and experience satisfactory to the Department to conduct such tests. In addition, at least 30 days prior to conducting such tests, the permittee shall notify the Department in writing of the time(s) and date(s) on which the tests will be conducted and shall allow Department personnel to observe such tests, record data, provide pre-weighed filters, analyze samples in a County laboratory and to take samples for independent analysis. Test results shall be comprehensively and accurately reported in the units of measurement specified by the applicable emission limitations of this permit.
- d. Test methods and procedures shall conform to the applicable reference method set forth in this permit or Article XXI Part G, or where those methods are not applicable, to an alternative sampling and testing procedure approved by the Department consistent with Article XXI §2108.02.e.2.



- e. **Violations:** The failure to perform tests as required by this permit or an order of the Department, the failure to submit test results within the time specified, the knowing submission of false information, the willful failure to submit complete results, or the refusal to allow the Department, upon presentation of a search warrant, to conduct tests, shall be a violation of this permit giving rise to the remedies provided by Article XXI §2109.02.

**13. Abrasive Blasting (§2105.51)**

- a. Except where such blasting is a part of a process requiring an operating permit, the permittee shall not conduct or allow to be conducted, abrasive blasting or power tool cleaning of any surface, structure, or part thereof, which has a total area greater than 1,000 square feet unless such abrasive blasting complies with all applicable requirements of Article XXI §2105.51.
- b. In addition to complying with all applicable provisions of §2105.51, the permittee shall not conduct, or allow to be conducted, abrasive blasting of any surface unless such abrasive blasting also complies with all other applicable requirements of Article XXI unless such requirements are specifically addressed by §2105.51.

**14. Asbestos Abatement (§2105.62, §2105.63)**

In the event of removal, encasement, or encapsulation of Asbestos-Containing Material (ACM) at a facility or in the event of the demolition of any facility, the permittee shall comply with all applicable provisions of Article XXI §2105.62 and §2105.63.

**15. Volatile Organic Compound Storage Tanks (§2105.12.a)**

The permittee shall not place or store, or allow to be placed or stored, a volatile organic compound having a vapor pressure of 1.5 psia or greater under actual storage conditions in any aboveground stationary storage tank having a capacity equal to or greater than 2,000 gallons but less than or equal to 40,000 gallons, unless there is in operation on such tank pressure relief valves which are set to release at the higher of 0.7 psig of pressure or 0.3 psig of vacuum or at the highest possible pressure and vacuum in accordance with State or local fire codes, National Fire Prevention Association guidelines, or other national consensus standard approved in writing by the Department. Petroleum liquid storage vessels that are used to store produced crude oil and condensate prior to lease custody transfer are exempt from these requirements.

**16. Fugitive Emissions (§2105.49)**

The permittee, in addition to complying with all other applicable provisions of this permit shall take all reasonable actions to prevent fugitive air contaminants from becoming airborne. Such actions may include, but are not limited to:

- a. The use of asphalt, oil, water, or suitable chemicals for dust control;
- b. The paving and maintenance of roadways, parking lots and the like;
- c. The prompt removal of earth or other material which has been deposited by leaks from transport, erosion or other means;
- d. The adoption of work or other practices to minimize emissions;
- e. Enclosure of the source; and
- f. The proper hooding, venting, and collection of fugitive emissions.



**17. Episode Plans (§2106.01 and Article XXI Part F)**

The permittee shall upon written request of the Department, submit a source curtailment plan, consistent with good industrial practice and safe operating procedures, designed to reduce emissions of air contaminants during air pollution episodes. Such plans shall meet the requirements of Article XXI §2106.02 and Article XXI Part F.

**18. New Source Performance Standards (§2105.05)**

- a. It shall be a violation of this permit giving rise to the remedies provided by §2109.02 of Article XXI for the permittee to operate, or allow to be operated, any source in a manner that does not comply with all requirements of any applicable NSPS now or hereafter established by the EPA, except if the permittee has obtained from EPA a waiver pursuant to Section 111 or Section 129 of the Clean Air Act or is otherwise lawfully temporarily relieved of the duty to comply with such requirements.
- b. If the permittee operates, or allows to be operated, any source subject to any NSPS, the permittee shall conduct, or cause to be conducted, such tests, measurements, monitoring and the like as is required by such standard. All notices, reports, test results and the like as are required by such standard shall be submitted to the Department in the manner and time specified by such standard. All information, data and the like which is required to be maintained by such standard shall be made available to the Department upon request for inspection and copying.

**19. National Emission Standards for Hazardous Air Pollutants (§2104.08)**

- a. The permittee shall comply with each applicable emission limitation, work practice standard, and operation and maintenance requirement of 40 CFR Part 63, Subpart YYYY – *National Emission Standards for Hazardous Air Pollutants: Electric Arc Furnace Steelmaking Facilities*.

**V. EMISSION UNIT LEVEL TERMS AND CONDITIONS****A. Process P001: F1 and F2 Electric Arc Furnaces**

<b>Process Description:</b>	Electric Arc Furnaces - F1 and F2
<b>Facility ID:</b>	P-001 and P-002, respectively
<b>Max. Design Rate:</b>	536,267 tons steel/year combined furnaces
<b>Raw Materials:</b>	Scrap, lime, and fluxes
<b>Control Device:</b>	DEC System Baghouses C001 (F1) & C002A (F2), Canopy Hoods Baghouses C006 (F1) & C002B (F2)

**1. Restrictions:**

- a. The permittee shall not cause to be discharged into the atmosphere from F1 or F2 any gases which: (§60.272a(a), §63.10686(b), §2102.04.b.6)
  - 1) Exit from any of the C001 or C002A DEC baghouses or the C002B canopy or C006 AOD/canopy baghouses and contain particulate matter in excess of 12 mg/dscm (0.0052 gr/dscf);
  - 2) Exit from any of the C001 or C002A DEC baghouses or the C002B canopy or C006 AOD/canopy baghouses and exhibit 3% opacity or greater as measured in accordance with EPA Method 9; and
  - 3) Exit from the EAF melt shop building and, due solely to the operations of F1 or F2, exhibit 6% opacity or greater.
- b. The permittee shall not cause to be discharged into the atmosphere from the dust-handling system for the C001 (F1) or C002A (F2) DEC baghouses or the C002B (F2) canopy or C006 (F1) AOD/canopy baghouses any gases that exhibit 10% opacity or greater as measured in accordance with EPA Method 9. (§60.272a(b))
- c. The permittee shall not conduct, or allow to be conducted, F1 or F2 process operations unless the furnace pollution control equipment is online and properly maintained and operated according to the following conditions: (§2102.04.b.6)
  - 1) F1 and F2 shall be equipped with a direct evacuation control (DEC) system with water-cooled ductwork.
  - 2) The gap, between the off-take elbow to each DEC and the associated water-cooled ductwork leading to the DEC baghouses shall not exceed 18 inches during melting.
  - 3) The fugitive emissions capture equipment shall consist of segmented canopy hood systems exhausting to baghouses C006 (F1 canopy) and C002B (F2 canopy), cross-draft partitions, a scavenger duct and closed roofs. The scavenger duct system shall be installed in the exhaust duct work between each canopy where it will be most effective, based on the canopy and duct configuration and design.
  - 4) The F1 DEC system shall be in place and operating at all times during F1 steel making operations and emissions shall be exhausted to the C001 baghouse.
  - 5) The F2 DEC system shall be in place and operating at all times during F2 steel making operations and emissions shall be exhausted to the C002A baghouse.
  - 6) F1 and F2 shall be equipped with canopy hoods for collection of process fugitive emissions. Such hoods shall operate at all times during steel making operations and emissions shall be

- exhausted to the C006 (F1 canopy) baghouse and the C002B (F2 canopy) baghouse, respectively.
- 7) The differential pressure drop across each baghouse compartment shall not exceed 15 in. w.c.
  - 8) The differential pressure drop across each compartment in the F1 and F2 DEC and canopy baghouses, shall be recorded once per week, during furnace operations.
  - 9) Should the differential pressure across a baghouse exceed 15 in. w.c., the permittee shall promptly investigate the cause of the deviation. The permittee shall record and maintain records of the following information for each investigation:
    - a) The date and time the deviation was observed;
    - b) The magnitude of the deviation observed;
    - c) The date(s) the investigation was conducted;
    - d) The findings, recommendations, and corrective actions for the investigation; and
    - e) The pressure drop reading after the deviation was corrected.
  - 10) The permittee shall take prompt action to correct any deviation and bring the control equipment back to normal operating parameters.
- d. The combined production of F1 and F2 shall not exceed 536,267 tons of steel in any consecutive 12-month period. (§2102.04.b.6)
  - e. F1 and F2 EAFs shall not operate more than 7,900 hours each in any consecutive 12-month period. (§2102.04.b.6)
  - f. Emissions from C001 or C002A DEC baghouses or the C002B Canopy or C006 AOD/Canopy baghouses, due to F1 and F2 operations, shall not exceed the limits in Table V-A-1: (§2102.04.b.6):

**TABLE V-A-1<sup>3</sup>  
Electric Arc Furnace Emission Limitations –  
F1 DEC Baghouse & F1 AOD/Canopy Baghouse<sup>2</sup> and  
F2 DEC Baghouse & F2 Canopy Baghouse**

<b>POLLUTANT</b>	<b>EMISSION LIMIT INDIVIDUAL FURNACE (lb/hr)</b>	<b>EMISSION LIMIT COMBINED FURNACES (tons/year)<sup>1</sup></b>
Particulate Matter	10.13	48.02
PM <sub>10</sub>	5.78	27.00
PM <sub>2.5</sub>	5.78	27.00
Sulfur Oxides	12.60	60.83
Nitrogen Oxides	22.80	126.24
Carbon Monoxide	124.98	637.33
Volatile Organic Compounds	28.56	130.18
Lead	0.08	0.32

<sup>1</sup> A year is defined as any consecutive 12-month period.

<sup>2</sup> Emissions only from the F1 EAF Canopy Baghouse (does not include emissions from the AOD or torch cutters).

<sup>3</sup> Ton per year emission limit is total for both F1 EAF and F2 EAF combined including Canopy Baghouses.

**2. Testing Requirements:**

- a. The permittee shall conduct emission tests on the melt shop furnaces and emission control equipment once every five years thereafter according to the following conditions: (§2102.04.b.6, §2107.02, §2108.02, §60.275a(d))
  - 1) The permittee shall conduct emission tests on the effluent gas streams of the C001 and C002A DEC baghouses, and the C002B Canopy and C006 AOD/Canopy baghouses during operation of the F1 and F2.
  - 2) Said testing shall measure emissions of filterable PM, condensable PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOCs from F1 and F2.
  - 3) Such testing shall be in accordance with requirements of 40 CFR §60.275a, Article XXI, §2108.02 and §2107.02 and the approved test protocol dated February 2022.
  - 4) In conducting the required performance tests, the permittee shall use as reference methods and procedures the test methods in 40 CFR Part 60 Appendix A and/or other methods and procedures as specified in applicable sections of 40 CFR Part 60 Subpart AAa and this permit.
- b. During performance tests, the permittee shall not add gaseous diluents to the effluent gas stream after the fabric in any pressurized fabric filter collector, unless the amount of dilution is separately determined and considered in the determination of emissions. (§2102.04.b.6, §2108.02, §60.275a(a))
- c. When emissions from F1 or F2 are combined with emissions from units not subject to 40 CFR Part 60 Subpart AAa, but controlled by a common capture system and control device(s), the permittee shall use either or both of the following procedures in performance tests: (§2102.04.b.6, §2108.02, §60.275a(b))
  - 1) Determine compliance using the combined emissions, and/or
  - 2) Use a method that is acceptable to the Department and that compensates for the emissions from the facilities not subject to the provisions of 40 CFR Part 60 Subpart AAa.
- d. When emissions from F1 or F2 are combined with emissions from units not subject to 40 CFR Part 60 Subpart AAa, the permittee shall demonstrate compliance with Condition V.A.1.a.3) above based on emissions from only F1 or F2. (§2102.04.b.6, §2108.02, §60.275a(c))
- e. In conducting the required emissions testing, the permittee shall use the reference methods and procedures specified in Part G of Article XXI and 40 CFR Part 60 Appendix A. (§2102.04.b.6, §2108.02, §60.275a(d))
- f. The permittee shall determine compliance with the particulate matter standards in Condition V.A.1.f above as follows: (§2102.04.b.6, §2108.02, §60.275a(e))
  - 1) US EPA Method 5D shall be used to determine the particulate matter concentration and volumetric flow rate of the effluent gas. The sampling time and sample volume for each run shall be at least four hours and 4.50 dscm (160 dscf) and, when a single EAF is sampled, the sampling time shall include an integral number of heats. A heat cycle begins when the EAF is first charged and ends when the EAF tap is completed.
  - 2) When more than one control device serves an EAF being tested, the concentration of particulate matter shall be determined using the following equation:

$$C_{st} = \frac{\sum_{i=1}^n (C_{si} Q_{sdi})}{\sum_{i=1}^n Q_{sdi}}$$

where:

$c_{st}$  =average concentration of particulate matter, mg/dscm (gr/dscf).

$c_{si}$  =concentration of particulate matter from control device "i", mg/dscm (gr/dscf).

n =total number of control devices tested.

$Q_{sdi}$  =volumetric flow rate of stack gas from control device "i", dscm/hr (dscf/hr).

- 3) Method 9 and the procedures of 40 CFR §60.11 shall be used to determine opacity.
  - 4) To demonstrate compliance with Condition V.A.1.a above, the Method 9 test runs shall be conducted concurrently with the particulate matter test runs, unless inclement weather interferes.
- g. The permittee shall collect the following data for all the heats processed during the performance test: (§2102.04.b.6, §2108.02, §60.275a(e)(4), §60.274a(c), §60.274a(h))
- 1) Control system fan amps and damper positions;
  - 2) The volumetric flow rate at each baghouse inlet;
  - 3) Charge weights and materials;
  - 4) Tap weights and materials;
  - 5) Charge to tap times for each heat;
  - 6) Heat times including start and stop times;
  - 7) A log of process operation including periods of no operation during testing.
  - 8) Control device operation logs for the time of the testing; and
  - 9) Method 9 observations data.
- h. The permittee shall perform emissions testing for the metals chromium, lead, manganese, and nickel in accordance with §2108.02. (§2102.04.b.6, §2108.02, 40 CFR Part 60 Appendices, Test Methods 12 or 29)
- i. The Department reserves the right to require additional emissions testing sufficient to assure compliance with the terms and conditions of this permit. (§2103.12.h.1, §2108.02)

### 3. Monitoring Requirements:

- a. Observations of the opacity of the visible emissions from the F1 and F2 DEC and canopy baghouses shall be performed by a Method 9 certified visible emission observer as follows: (§2103.12.i, §60.273a(c))
  - 1) Visible emission observations shall be conducted at least once per day per furnace when F1 and/or F2 is operating in the melting period. These observations shall be taken in accordance with US EPA Method 9, and, for at least three six-minute periods, the opacity shall be recorded for any point(s) where visible emissions are observed.
  - 2) Where it is possible to determine that several visible emission sites relate to only one incident of the visible emissions, only one set of three six-minute observations will be required. In this

case, Method 9 observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.

- 3) Records shall be maintained of any six-minute average that is in excess of the emission limit specified in Condition V.A.1.a above
- b. Observations of EAF melt shop opacity shall be performed by a certified visible emission observer as follows: (§2103.12.i, §60.273a(d))
  - 1) Shop opacity observations shall be conducted at least once per day when F1 and/or F2 are operating in the melting period. Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop taken in accordance with US EPA Method 9. Shop opacity shall be recorded for any point(s) where visible emissions are observed.
  - 2) Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one observation of shop opacity will be required. In this case, the shop opacity observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.
- c. The permittee shall check and record the fan motor amperes and damper positions for the F1 and F2 EAF emission control systems at least a once-per-shift basis. (§2103.12.i, §60.274a(b))
- d. When the permittee is required to demonstrate compliance with the standards under Condition V.A.1.e above the fan motor amperes and all damper positions for the F1 and F2 emission control systems shall be determined during all periods in which a hood is operated for the purpose of capturing emissions from F1 or F2. The values of these parameters as determined during the most recent demonstration of compliance shall be maintained at the appropriate level for each applicable period. (§2103.12.i, §60.274a(c))
- e. The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture system and baghouses for F1 and F2. These inspections shall include observations of the physical appearance of the equipment. Any deficiencies shall be noted, and proper maintenance performed. (§2102.04.b.6, §2103.12.i, §60.274a(d))
- f. The permittee shall have instrumentation to continuously monitor the differential pressure drop across each compartment of the F1 and F2 DEC and canopy baghouses during operation of F1 and F2. Said instrumentation shall be properly operated, calibrated, and maintained according to manufacturer's specifications. (§2103.12.i, §2102.04.b.6)
- g. The permittee shall inspect F1 and F2, the C001 and C002A DEC baghouses, and the C002B canopy and C006 canopy baghouses weekly to insure proper operation and compliance with permit conditions. (§2103.12.i, §2102.04.b.6)

#### 4. Record Keeping Requirements:

- a. The permittee shall keep and maintain the following data: (§2102.04.b.6, §2103.12.j, §60.274a, §60.273a(c), §60.273a(d), §60.276a(b))
  - 1) Visual emissions data obtained under Condition V.A.3.a.1) above;
  - 2) Monthly operational status inspections performed under Condition V.A.3.c above;



- 3) Fan motor amp data on a rolling 12-month average basis;
  - 4) Fan motor amp and damper position data obtained under Condition V.A.3.d above;
  - 5) Opacity data obtained under Condition V.A.3.a above and Condition V.A.3.b above;
  - 6) Monthly and 12-month production for each furnace;
  - 7) Inspection data obtained under Condition V.A.3.g above;
  - 8) Records required by the scrap management pollution prevention plan in Part 63 Subpart YYYYYY; and
  - 9) Records of operation, maintenance, and inspections.
- b. The permittee shall record all instances of noncompliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.j, §2102.04.e)
- c. Records shall be retained by the facility for at least five years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j, §60.276a(a))
- d. In addition to the records required by 40 CFR §63.10, the permittee must keep records to demonstrate compliance with the requirements of Condition V.A.6.a.2) below and/or for the use of only restricted scrap in paragraph 40 CFR §63.10685(a)(1) and for mercury in paragraphs 40 CFR §10685(b)(1) through (b)(3) of this section as applicable. The permittee must keep records documenting compliance with paragraph 40 CFR §10685(b)(4) of this section for scrap that does not contain motor vehicle scrap. (§2103.12.j, §63.10685(c))
- 1) Should the permittee become subject to the requirements for a site-specific plan for mercury under paragraph 40 CFR §10685(b)(1), the permittee must: (§2103.12.j, §63.10685.c.1, §63.10685.c.1.i)
    - a) Maintain records of the number of mercury switches removed or the weight of mercury recovered from the switches and properly managed, the estimated number of vehicles processed, and an estimate of the percent of mercury switches recovered.

## 5. Reporting Requirements:

- a. The permittee shall report the following information to the Department in its semiannual report. The report shall contain all required information for the time period of the report.: (§2102.04.b.6, §2103.12.k, §60.276a)
- 1) Monthly and 12-month summaries of fan amps data including monthly maximum and minimum values observed for each fan;
  - 2) Reports of opacity observations that are exceedances of Conditions V.A.1.a.2 or 3. Reports shall consist of the copies of the observation forms and a summary of the observation results, date and time of the observations, and sources observed; and
  - 3) Noncompliance information required to be recorded by Condition V.A.4.b.
- b. If the permittee is subject to the option for approved mercury programs under paragraph (b)(2) of this section, the permittee must maintain records identifying each scrap provider and documenting the scrap provider's participation in an approved mercury switch removal program. If the permittee purchases motor vehicle scrap from a broker, the permittee must maintain records identifying each broker and documentation that all scrap provided by the broker was obtained from other scrap providers who participate in an approved mercury switch removal program. (§2103.12.k, §63.10685.c.2)

- c. The permittee must submit semiannual compliance reports, as applicable, to the Department for the control of contaminants from scrap according to the requirements in 40 CFR §63.10685(c). The report must clearly identify any deviation from the requirements in 40 CFR §63.10685(a) and (b) and the corrective action taken. The permittee must identify which compliance option in 40 CFR §63.10685(b) applies to each scrap provider, contract, or shipment. (§2103.12.k, §63.10685(c))
- d. Reporting instances of noncompliance does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7, if appropriate. (§2103.12.k)

## 6. Work Practice Standard:

- a. *Chlorinated plastics, lead, and free organic liquids.* For metallic scrap utilized in the EAF, the permittee shall comply with the requirements in either Condition V.A.6.a.1) below (40 CFR §63.10685(a)(1)) or Condition V.A.6.a.2) below (40 CFR §63.10685(a)(2)). The permittee may have certain scrap at the facility subject to paragraph 40 CFR §63.10685(a)(1) and other scrap subject to paragraph 40 CFR §63.10685(a)(2) provided the scrap remains segregated until charge make-up. (§63.10685(a))
  - 1) *Pollution prevention plan.* For the production of steel other than leaded steel, the permittee shall prepare and implement a pollution prevention plan for metallic scrap selection and inspection to minimize the amount of chlorinated plastics, lead, and free organic liquids that is charged to the furnace. For the production of leaded steel, the permittee shall prepare and implement a pollution prevention plan for scrap selection and inspection to minimize the amount of chlorinated plastics and free organic liquids in the scrap that is charged to the furnace. The permittee shall submit the scrap pollution prevention plan to the Department for approval. The permittee shall operate according to the plan as submitted during the review and approval process, operate according to the approved plan at all times after approval, and address any deficiency identified by the Department within 60 days following disapproval of a plan. The permittee may request approval to revise the plan and may operate according to the revised plan unless and until the revision is disapproved by the Department. The permittee shall keep a copy of the plan onsite, and the permittee shall provide training on the plan's requirements to all plant personnel with materials acquisition or inspection duties. Each plan shall include the information in paragraphs Condition V.A.6.a.1)a) below through Condition V.A.6.a.1)d) below. (§63.10685(a)(1))
    - a) Specifications that scrap materials shall be depleted (to the extent practicable) of undrained used oil filters, chlorinated plastics, and free organic liquids at the time of charging to the furnace. (§63.10685(a)(1)(i))
    - b) A requirement in your scrap specifications for removal (to the extent practicable) of lead-containing components (such as batteries, battery cables, and wheel weights) from the scrap, except for scrap used to produce leaded steel. (§63.10685(a)(1)(ii))
    - c) Procedures for determining if the requirements and specifications in Condition V.A.6.a.1) above are met (such as visual inspection or periodic audits of scrap providers) and procedures for taking corrective actions with vendors whose shipments are not within specifications. (§63.10685(a)(1)(iii))
    - d) The requirements of Condition V.A.6.a.1) above do not apply to the routine recycling of baghouse bags or other internal process or maintenance materials in the furnace. These exempted materials shall be identified in the pollution prevention plan. (§63.10685(a)(1)(iv))
  - 2) *Restricted metallic scrap.* For the production of steel other than leaded steel, the permittee shall not charge to a furnace metallic scrap that contains scrap from motor vehicle bodies, engine



blocks, oil filters, oily turnings, machine shop borings, transformers or capacitors containing polychlorinated biphenyls, lead-containing components, chlorinated plastics, or free organic liquids. For the production of leaded steel, the permittee shall not charge to the furnace metallic scrap that contains scrap from motor vehicle bodies, engine blocks, oil filters, oily turnings, machine shop borings, transformers or capacitors containing polychlorinated biphenyls, chlorinated plastics, or free organic liquids. This restriction does not apply to any post-consumer engine blocks, post-consumer oil filters, or oily turnings that are processed or cleaned to the extent practicable such that the materials do not include lead components, chlorinated plastics, or free organic liquids. This restriction does not apply to motor vehicle scrap that is charged to recover the chromium or nickel content if the permittee meets the requirements in paragraph Condition V.A.6.b.1) below. (§63.10685(a)(2))

- b. *Mercury requirements.* For scrap that does not contain motor vehicle scrap, the permittee shall procure the scrap pursuant to the requirements in Condition V.A.6.b.2) below for each scrap provider, contract, or shipment. The permittee may have one scrap provider, contract, or shipment subject to one compliance provision and others subject to another compliance provision. (§63.10685(b))
- 1) *Option for specialty metal scrap.* The permittee Shall certify in its notification of compliance status that the only materials from motor vehicles in the scrap are materials recovered for their specialty alloy (including, but not limited to, chromium, nickel, molybdenum, or other alloys) content (such as certain exhaust systems) and, based on the nature of the scrap and purchase specifications, that the type of scrap is not reasonably expected to contain mercury switches. (§63.10685(b)(3))
  - 2) *Scrap that does not contain motor vehicle scrap.* For scrap not subject to the requirements in Condition V.A.6.b.1) above, you shall certify in your notification of compliance status and maintain records of documentation that this scrap does not contain motor vehicle scrap. (§63.10685(b)(4))

**7. Additional Requirements:**

None except as provided elsewhere.

**B. Process P002: CT-001 and CT-002 Cooling Towers**

**Process Description:** F1 and F2 Cooling Towers  
**Facility ID:** CT-001 and CT-002  
**Max. Design Rate:** 12,000 gallons/minute each  
**Control Device:** Drift Eliminators

**1. Restrictions:**

- a. Emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub> from the F1 and F2 cooling towers shall be controlled according to the following conditions: (§2102.04.b.6)
  - 1) The maximum monthly average total dissolved solids in the cooling tower influent shall not exceed 1360 ppm.
  - 2) Each cooling tower shall be supplied with drift eliminators with a maximum drift not to exceed 0.005%.
- b. Combined emissions from F1 and F2 cooling towers shall not exceed the following limitations: (§2102.04.b.6)

**TABLE V-B-1  
F1 and F2 Cooling Towers Emission Limitations**

POLLUTANT	HOURLY EMISSION LIMIT (lb/hr)	COMBINED HOURLY EMISSION LIMIT (lb/hr)	COMBINED ANNUAL EMISSION LIMIT (tons/year)*
Particulate Matter	0.41	0.82	3.60
PM <sub>10</sub>	0.41	0.82	3.60
PM <sub>2.5</sub>	0.41	0.82	3.60

\* A year is defined as any consecutive 12-month period.

**2. Testing Requirements:**

The Department reserves the right to require emissions testing sufficient to assure compliance with the terms and conditions of this permit. Such testing shall be performed in accordance with Article XXI §2108.02. (§2103.12.h.1, §2108.02)

**3. Monitoring Requirements:**

The permittee shall monitor the TDS content of the influent to the cooling towers quarterly. (§2103.12.i)

**4. Record Keeping Requirements:**

- a. The permittee shall record the quarterly TDS values in each cooling tower. (§2103.12.h.1, §2103.12.j)
- b. The permittee shall record all instances of noncompliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2102.04.b.6, §2103.12.j)

- c. All records shall be retained by the facility for at least five years. These records shall be made available to the Department upon request for inspection and/or copying. (§2102.04.b.6, §2103.12.j)

**5. Reporting Requirements:**

- a. The permittee shall submit semiannual reports to the Department in accordance with General Condition III.15. (§2103.12.k)
- b. The permittee shall report the quarterly TDS readings in the semiannual report. (§2103.12.k)
- c. The permittee shall report all instances of noncompliance with the conditions of this permit along with all corrective action taken to restore compliance, to the Department in the semiannual report. (§2103.12.h.1, §2103.12.k)
- d. Reporting instances of noncompliance in accordance with Condition V.B.5.c above, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.7, if appropriate. (§2103.12.h.1, §2103.12.k)

**6. Work Practice Standard:**

None except as provided elsewhere.

**7. Additional Requirements:**

None except as provided elsewhere.

## VI. MISCELLANEOUS

*No miscellaneous sources exist for this installation.*

## VII. ALTERNATIVE OPERATING SCENARIOS

*No alternative operating scenarios exist for this installation.*

**VIII. EMISSIONS LIMITATIONS SUMMARY**

The annual emission limitations for the ATI Flat Rolled Products Holdings, LLC, F1 and F2 electric arc furnaces and associated cooling towers are summarized in the following table:

**TABLE VIII-1: Emission Limitations Summary**

POLLUTANT	ANNUAL EMISSION LIMIT (tons/year)*
Particulate Matter	51.62
PM <sub>10</sub>	30.60
PM <sub>2.5</sub>	30.60
Sulfur Oxides (SO <sub>x</sub> )	60.84
Nitrogen Oxides (NO <sub>x</sub> )	126.24
Carbon Monoxide (CO)	637.33
Volatile Organic Compounds (VOC)	130.18
Lead	0.32

\* A year is defined as any consecutive 12-month period.