

May 15, 2020

***Via E-Mail***

Max Slater  
ACHD Hearing Officer  
542 Fourth Avenue  
Pittsburgh, PA 15219  
[max.slater@alleghenycounty.us](mailto:max.slater@alleghenycounty.us)

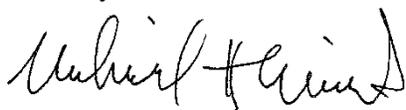
Office of the Director, Debra Bogen  
Allegheny County Health Department  
Assistant to the Director  
542 Fourth Avenue  
Pittsburgh, PA 15219  
[todd.bogdanovich@alleghenycounty.us](mailto:todd.bogdanovich@alleghenycounty.us)

**RE: ATI Flat Rolled Products Holdings, LLC**  
**In re: Appeal of Minor Source/Minor Modification Installation Permit # 0059-I009**

Dear Hearing Officer Slater and Director Bogen:

Pursuant to Article XI of the Rules and Regulations of the Allegheny County Health Department, ATI Flat Rolled Products Holdings, LLC (“ATI”) submits for filing the enclosed Notice of Appeal regarding the above-referenced permit issued April 16, 2020. If you have any questions or wish to discuss this matter further, please contact me at [mwinek@babstcalland.com](mailto:mwinek@babstcalland.com) or (412) 394-6538.

Sincerely,



Michael H. Winek, Esq.  
Counsel for ATI

Enclosures

Cc: Jason Willis, Esq. (via e-mail: [Jason.Willis@AlleghenyCounty.us](mailto:Jason.Willis@AlleghenyCounty.us))  
Jeff Bailey, Esq. (via e-mail: [Jeff.Bailey@AlleghenyCounty.us](mailto:Jeff.Bailey@AlleghenyCounty.us))  
Lauren McAndrews, Esq.  
Varun Shekhar, Esq.



# Notice of Appeal

This form is used to file an appeal of an order, notice, decision, determination, or ruling by the Allegheny County Health Department. Please complete this form (use additional pages as necessary). If more than one person or entity is filing this appeal, please attach a separate form for each additional appellant. **A copy of the order, notice, decision, determination, or ruling must be attached to the Notice of Appeal.**

Name ATI Flat Rolled Products Holdings, LLC

Mailing Address 100 River Road

City Brackenridge State PA Zip 15014 Email Lauren.McAndrews@ATImetals.com

Phone ATI Flat Rolled Products Holdings, LLC Fax (optional) \_\_\_\_\_

If you are represented by an attorney, please provide contact information for your attorney:

Name Michael H. Winek and Varun Shekhar, Babst Calland Clements & Zomnir, PC

Mailing Address Two Gateway Center, Sixth Floor

City Pittsburgh State PA Zip 15222 Email mwinek@babstcalland.com

Phone ATI Flat Rolled Products Fax (optional) \_\_\_\_\_

Describe your objections to the Department's actions and a statement describing the relief you want the Hearing Officer to grant. (*The objections may be factual or legal and must be specific. If you fail to state an objection here, you may be barred from raising it later in your appeal. Use additional pages if necessary.*)

See Exhibit A: Statement of Objections in Notice of Appeal  
and Requested Relief, attached.

**By filing this Notice of Appeal with the Allegheny County Health Department, I hereby certify that the information submitted is true and correct to the best of my information and belief.**

Signature *Michael H. Winek* Date May 15, 2020

Appeals should be submitted in person or by mail to:  
**Allegheny County Health Department**  
**Attention: Hearing Officer**  
**542 4th Avenue**  
**Pittsburgh, PA 15219**

**BEFORE THE ALLEGHENY COUNTY HEALTH DEPARTMENT  
542 FOURTH AVENUE  
PITTSBURGH, PENNSYLVANIA 15219**

ATI FLAT ROLLED PRODUCTS	)	
HOLDINGS, LLC	)	
	)	
v.	)	In re: Appeal of Minor Source/Minor
	)	Modification Installation Permit
	)	# 0059-I009
	)	
ALLEGHENY COUNTY	)	
HEALTH DEPARTMENT	)	

**EXHIBIT A: STATEMENT OF OBJECTIONS IN NOTICE OF APPEAL AND  
REQUESTED RELIEF**

Pursuant to Article XI, Section 1103 of the Allegheny County Health Department’s Rules and Regulations, Appellant ATI Flat Rolled Products Holdings, LLC (“ATI”) appeals from the Department’s issuance of Minor Source/Minor Modification Installation Permit # 0059-I009 (“Permit”), directed to ATI’s Brackenridge, PA facility (“Facility”). A true and correct copy of the Permit is attached to this Notice of Appeal as Exhibit B. Objections and other assertions forming the basis for this appeal and corresponding requested relief are as follows:

1. As the recipient of a permit with enforceable conditions that it objects to, ATI is an aggrieved party as described in Section 2102.03.h.1 of Article XXI of the Department’s Rules and Regulations and has a direct interest in this appeal.
2. ATI objects to the Department’s issuance of the Permit because it contains numerous enforceable conditions that are arbitrary and capricious, unreasonable, an abuse of the Department’s discretion, and contrary to law including the Pennsylvania Air Pollution Control Act, 35 P.S. Section 4001 *et seq* (“APCA”), federal Clean Air Act (“CAA”) and Article XXI.
3. Section V.C.1.b of the Permit contains a requirement that “all emissions from

HNO<sub>3</sub>/HF pickling are processed through the wet chemical packed tower scrubber D-019” (emphasis added). However, the D-019 scrubber and associated equipment cannot reasonably be operated with 100% capture efficiency. As a result, this condition’s requirement to process “all” emissions, is unachievable, unreasonable, arbitrary and capricious, contrary to law including the APCA, CAA and Article XXI, and an abuse of the Department’s discretion.

ATI requests that Section V.C.1.b of the Permit be amended to delete the word “all” from this condition.

4. Section V.C.1.b.3 of the Permit imposes a minimum scrubbing liquid flow rate of 450 gallons per minute for the No. 2 A&P Line. Such limit does not reflect the typical range of scrubbing liquid flow rate that is necessary for proper and routine operation of the D-019 scrubber, which is substantially lower than the Permit’s minimum limit. In addition, such limit has never been imposed as an enforceable condition for the No. 2 A&P Line in any other prior permit for the Facility. As a result, the Department’s establishment of such a limit at all, let alone at an inappropriately high rate, is unreasonable, arbitrary and capricious, contrary to law including the APCA, CAA and Article XXI, and an abuse of the Department’s discretion.

ATI requests that Section V.C.1.b.3 be amended to revise the 450 gallons per minute limit to 150 gallons per minute, which is a sufficient number to capture the normal and routine range of scrubbing liquid flow rate at the D-019 scrubber.

5. Section V.C.1.b.4 of the Permit imposes a maximum differential pressure drop across the D-019 scrubber at 3.0” w.c. Such limit does not reflect the typical range of pressure drop differential necessary for proper and routine operation of the D-019 scrubber, which is higher than the Permit’s maximum limit, and is unreasonable, arbitrary and capricious, contrary to law including the APCA, CAA and Article XXI, and an abuse of the Department’s discretion.

ATI requests that Section V.C.1.b.4 be amended to revise the maximum differential pressure drop limit to 9.0" w.c, which is a sufficient number to capture the normal and routine range of differential pressure drop at the D-019 scrubber.

6. Section V.C.1.b.4 also imposes a minimum exhaust flow rate limit through the D-019 scrubber of 6,000 acfm at all times. However, it is infeasible to determine the exhaust flow rate at all times at the scrubber because there is no exhaust flow rate monitor equipped at the scrubber, nor is such monitor required under the Permit. In addition, this limitation does not reflect typical ranges of exhaust flow rates under normal operations at the D-019 scrubber. Such limit has never been imposed as an enforceable condition for the No. 2 A&P Line in any other prior permit for the Facility. For these reasons, Section V.C.1.b.4's minimum exhaust flow rate limitation is unreasonable, arbitrary and capricious, contrary to law including the APCA, CAA and Article XXI, and an abuse of the Department's discretion.

ATI requests that Section V.C.1.b.4 be amended to delete the exhaust flow rate limitation.

7. Section V.C.1.b.5 of the Permit requires ATI to install instrumentation at the D-019 scrubber to continuously monitor, among other things, scrubbing liquid flow rate to within 1 gallon per minute of the actual flow rate, and differential pressure drop to within 0.5" w.c. of the actual pressure drop, at all times. The requirements to achieve the specified monitoring accuracy ranges for scrubbing liquid flow rate and differential pressure drop have never been imposed as enforceable conditions for the No. 2 A&P Line in any other prior permit for the Facility. Prior to the imposition of this limit, ATI had installed instrumentation at the D-019 scrubber to monitor these parameters. ATI would be unreasonably forced to uninstall such equipment and acquire and install alternate equipment to achieve the requirements in this section, without any benefit to the environment or public health, or without any reasonable justification.

In addition, this section requires monitoring to the specified accuracy ranges for scrubbing liquid flow rate and differential pressure drop at all times. The condition fails to make reasonable allowances for maintenance periods or periods of calibration of the monitoring instrumentation, all of which are necessary to ensure proper monitor function. As a result, the Department's establishment of such parametric monitoring specifications are unreasonable, arbitrary and capricious, contrary to law including the APCA, CAA and Article XXI, and an abuse of discretion of the Department.

ATI requests that Section V.C.1.b.5 be revised such that the monitoring precision specifications of 1 gallon per minute for scrubbing liquid flow rate and 0.5" w.c. for pressure drop differential be deleted. In addition, ATI requests that the phrase "at all times" be deleted from this section.

8. Section V.C.3.b.3 of the Permit requires that instrumentation be installed at the packed bed scrubbers at the No. 2 A&P Line to continuously monitor at all times, among other things, the scrubbing liquid pH to within 5% of the actual pH. The requirements to achieve the specified monitoring accuracy range for scrubbing liquid pH has never been imposed as an enforceable condition for the No. 2 A&P Line in any other prior permit for the Facility. Prior to the imposition of this limit, ATI had installed instrumentation at the D-019 scrubber to monitor pH. ATI would be unreasonably forced to uninstall such equipment and acquire and install alternate equipment to achieve the requirements in this section, without any benefit to the environment or public health, or without any reasonable justification.

In addition, Section V.C.3.b generally requires monitoring for certain parameters, including scrubbing liquid pH, at all times. The condition fails to make reasonable allowances for maintenance periods or periods of calibration of the monitoring instrumentation, all of which are

necessary to ensure proper monitor function. As a result, the Department's establishment of such parametric monitoring specifications are unreasonable, arbitrary and capricious, contrary to law including the APCA, CAA and Article XXI, and an abuse of discretion of the Department.

ATI requests that Section V.C.3.b.3 be revised such that the monitoring accuracy specification of 5% for scrubbing liquid pH be deleted. In addition, ATI requests that Section V.C.3.b be revised to delete the phrase "at all times."

9. Section V.C.4.a of the Permit requires recordkeeping of monitoring data for, among other things, the scrubber's differential pressure drop to within 0.5" w.c. of the actual pressure drop, and the scrubber liquid pH to within 5% of the actual pH, on a "daily, monthly, average, and 12-month" basis. As specified in the preceding paragraphs, the requirements to obtain monitoring data to the specified accuracy ranges for differential pressure drop and pH have never been required in prior Facility permits and would otherwise unreasonably require removal of already-installed monitoring equipment for these parameters. The Department's imposition of these requirements is therefore unreasonable, arbitrary and capricious, contrary to law including the APCA, CAA and Article XXI, and an abuse of the Department's discretion.

ATI requests that Section V.C.4.a.3 and 6 of the Permit be revised to respectively delete that 0.5" w.c. and 5% accuracy ranges for differential pressure drop and pH.

10. Section V.C.3.c of the Permit requires ATI to perform daily visual inspection of emissions and weekly inspections of the scrubber to, among other things, "ensure that there is no evidence of chemical attack on its structural integrity." However, it is not feasible to ensure that there is no evidence of chemical attack on structural integrity of the scrubber by means of a visual inspection. The determination of such condition requires more intrusive monitoring methods to establish the existence of a corrosive environment at the scrubber. As a result, the Department's

end of determining the absence of chemical attack at the scrubber is not aligned with the means of visual inspection, and is unreasonable, arbitrary and capricious, contrary to law including the APCA, CAA and Article XXI, and an abuse of the Department's discretion.

11. Section V.C of the Permit contains limitations (including but not limited to nitrogen oxides emissions limits) and other requirements associated with the Facility's No. 2 A&P Line. However, it fails to establish any such requirements for the Facility's No. 1 A&P Line. The Department's failure to establish appropriate requirements for the Facility's No. 1 A&P Line is unreasonable, arbitrary and capricious, contrary to law including the APCA, CAA and Article XXI, and an abuse of the Department's discretion.

ATI requests that Section V.C of the Permit be revised in the manner described in Paragraphs 1-7 above, and that such revised version of Section V.C be made applicable to both the No. 1 and No.2 A&P Lines at the Facility. In addition, ATI requests that an additional table be added to Section V.C.1 of the Permit to establish the following emissions limits for nitrogen oxides for the No. 1 A&P Line: (1) a 15.5 lbs/hr hourly emission limit, and (2) a 67.8 tons/year annual emission limit.

12. Section V.E.1.b of the Permit imposes a maximum limit of 5.2 lbs/gallon for VOC content of paints/coatings used in miscellaneous painting/coating activities at the Facility, excluding water and exempt solvents, and after adjustment to a standard solvent density of 7.36 lbs/gallon and a solids basis. This VOC content limitation does not provide for any averaging basis. To the extent that this limit is construed as an instantaneous limit, this limit does not reflect an appropriate reasonably available control technology (RACT)-based limit, considering that the prior RACT permit issued for the Facility imposed a limit of 7.0 lbs/gallon for VOC content of paints/coatings. The prior RACT permit limit reflects a reasonable VOC limit for this source,

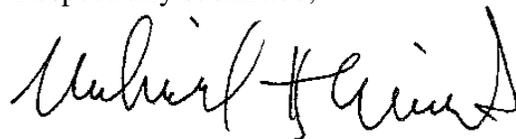
whereas the value of 5.2 lbs/gallon is wholly inappropriate for use on an instantaneous basis, considering that ATI supplied that value with explicit characterization of it as an annual average value for VOC content for paints/coatings. Furthermore, miscellaneous painting activities at ATI are not part of the manufacturing process. These activities are primarily maintenance and safety related painting activities. As such, these activities are not subject to Article XXI 2105.10 (surface coating processes). Therefore, the Permit's 5.2 lbs/gallon VOC content limit for paints/coatings is unreasonable, arbitrary and capricious, contrary to law including the APCA, CAA and Article XXI, and an abuse of the Department's discretion.

ATI requests that Section V.E.1.b be revised to replace the 5.2 lbs/gallon VOC content limit with a 7.0 lbs/gallon limit.

The objections raised in this Notice of Appeal are raised in alongside those lodged with the Department pursuant to a May 1, 2020 email and attachments from ATI to JoAnn Truchan, which are hereby incorporated into this appeal.

Dated: May 15, 2020

Respectfully submitted,



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*Attorneys for ATI Flat Rolled Products Holdings, LLC*



**AIR QUALITY PROGRAM**  
**301 39th Street, Bldg. #7**  
**Pittsburgh, PA 15201-1811**

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

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

**ACHD Permit #:** 0059-I009  
**Date of Issuance:** April 16, 2020  
**Expiration Date:** (See Section III.12)

**Issued By:** \_\_\_\_\_  
JoAnn Truchan, P.E.  
Section Chief, 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, Environmental Affairs  
**Company:** ATI Flat Rolled Products Holdings, LLC  
**Address:** 100 River Road  
Brackenridge, PA 15014-1597

**Telephone Number:** 724-226-5947  
**Fax Number:** 724-226-5292

**Facility Contact:** **Deborah Calderazzo**  
**Title:** Director, Environmental Affairs  
**Telephone Number:** 724-226-5947  
**Fax Number:** 724-226-5292  
**E-mail Address:** **Deborah.Calderazzo@ATIMetals.com**

### AGENCY ADDRESSES:

**ACHD Contact:** **Section Chief, Engineering**  
**Allegheny County Health Department**  
Air Quality Program  
301 39th Street, Building #7  
Pittsburgh, PA 15201-1811

**EPA Contact:** **Enforcement Programs Section (3AP12)**  
**USEPA Region III**  
1650 Arch Street  
Philadelphia, PA 19103-2029

## II. FACILITY DESCRIPTION

### FACILITY DESCRIPTION

The ATI Flat Rolled Products Holdings, LLC (ATI) Brackenridge Plant, located at 100 River Road, Brackenridge, Allegheny County, PA, is a producer of specialty products from scrap and other additives.

The facility is a minor source of lead (Pb), oxides of sulfur (SO<sub>x</sub>), HAPs, sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) and nitric acid (HNO<sub>3</sub>). It is a major source of particulate matter (PM), particulate matter less than 10 microns in diameter (PM<sub>10</sub>), particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>), oxides of nitrogen (NO<sub>x</sub>), carbon monoxide (CO), volatile organic compounds (VOCs) and carbon dioxide (CO<sub>2e</sub>) as defined in section 2101.20 of Article XXI.

### INSTALLATION DESCRIPTION

This permit is an installation addressing the requirements for case-by-case RACT for this facility.

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

**Table I-1: RACT: Table of Requirements**

Source	RACT II Requirement	Basis
V.A: EAF F1 F2	RACT consists of continued compliance with all applicable regulatory and permit requirements.	No feasible control technology available for NO <sub>x</sub> or VOCs Meets BACT
V.B: Argon-Oxygen Decarburization Vessel (AOD)	RACT consists of continued compliance with all applicable regulatory and permit requirements.	No feasible control technology available for NO <sub>x</sub> or VOCs
V.C: No.2 A & P Line, H <sub>2</sub> SO <sub>4</sub> -HNO <sub>3</sub> /HF Pickling (NO <sub>x</sub> only)	RACT consists of continued compliance with all applicable regulatory and permit requirements.	Source meets BACT
V.D: Lewis Temper Mill (VOCs only)	RACT consists of continued compliance with all applicable regulatory and permit requirements and Consent Decree No. 260.	§2105.06 of Article XXI and Consent Decree No. 260
V.E: Miscellaneous Paints (VOCs only)	<ol style="list-style-type: none"> <li>1. Store all VOC-containing coatings, thinners, coating-related waste materials, cleaning materials and used shop towels in closed containers.</li> <li>2. Ensure that mixing and storage containers used for VOC-containing coatings, thinners, coating-related waste materials and cleaning materials are kept closed at all times except when depositing or removing these materials.</li> <li>3. Minimize spills of VOC-containing coatings, thinners, coating-related waste materials and cleaning materials, cleaning up spills immediately.</li> <li>4. Convey VOC-containing coatings, thinners, coating-related waste materials and cleaning materials from one location to another in closed containers.</li> </ol>	Revised ATI analysis of paint usage. No feasible control technology available for VOCs

### ***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)**

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:

- a. Exceed the amounts permitted by this permit or by any order or permit issued pursuant to Article XXI;
- b. Cause an exceedance of the ambient air quality standards established by Article XXI §2101.10; or
- c. May reasonably be anticipated to endanger the public health, safety, or welfare.

### **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. In any event, this Installation Permit shall expire upon completion of construction, except that this Installation Permit 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 this Permit.

**13. Annual Installation Permit Administrative Fee (§2102.10.c & e)**

No later than 30 days after the date of issuance of this Installation Permit and on or before the last day of the month in which this permit was issued in each year thereafter, during the term of this permit until a subsequent corresponding Operating Permit or amended Operating Permit is properly applied for, the owner or operator of such source shall pay to the Department, in addition to all other applicable emission and administration fees, an Annual Installation Permit Administration Fee in an amount of \$750.

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

The provisions of this permit are severable, and if any provision of this permit is determined to by a court of competent jurisdiction 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.
  - 3) The first semiannual report shall be due July 31, 2020 for the time period beginning on the issuance date of this permit through June 30, 2020.
- e. Reports may be emailed to the Department at [aqreports@alleghenycounty.us](mailto:aqreports@alleghenycounty.us) in lieu of mailing a hard copy.

#### **16. Minor Installation Permit Modifications (§2102.10.d)**

Modifications to this Installation Permit may be applied for but only upon submission of an application with a fee in the amount of \$300 and where:

- a. No reassessment of any control technology determination is required; and
- b. No reassessment of any ambient air quality impact is required.

#### **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 §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, no person shall 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.

### 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. Operation and Maintenance (§2105.03)

All air pollution control equipment required by this permit or any order under Article XXI, and all equivalent compliance techniques approved by the Department, shall be properly installed, maintained, and operated consistently with good air pollution control practice.

### 6. Open Burning (§2105.50)

No person shall conduct, or allow to be conducted, the open burning of any material, except where the Department has issued an Open Burning Permit to such person 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.

### 7. 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 person responsible for such equipment 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.7.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.

#### **8. 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 person responsible for such equipment or source 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.

**9. 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 person responsible for such equipment 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.

**10. Monitoring of Malodorous Matter Beyond Facility Boundaries (§2104.04)**

The permittee shall take all reasonable action as may be necessary to prevent malodorous matter from becoming perceptible beyond facility boundaries. Further, the permittee shall perform such observations as may be deemed necessary along facility boundaries to insure that malodorous matter beyond the facility boundary in accordance with Article XXI §2107.13 is not perceptible and record all findings and corrective action measures taken.

**11. 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.

## 12. Orders (§2108.01.f)

In addition to meeting the requirements Site Level Conditions IV.7 through IV.11, inclusive, the person responsible for any source 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.

## 13. Violations (§2108.01.g)

The failure to submit any report or update thereof required by Site Level Conditions IV.7 through IV.12 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.

## 14. Emissions Testing (§2108.02)

- a. **Orders:** 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 person responsible for the affected source 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 person responsible 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.

**15. Abrasive Blasting (§2105.51)**

- a. Except where such blasting is a part of a process requiring an operating permit, no person shall 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, no person shall 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.

**16. 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.

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

No person shall 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.

**18. Fugitive Emissions (§2105.49)**

The person responsible for a source of fugitive emissions, 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.

**19. Episode Plans (§2106.02)**

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.

**20. 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 any person 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 such person 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. Any person who operates, or allows to be operated, any source subject to any NSPS 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.

**V. EMISSION UNIT LEVEL TERMS AND CONDITIONS****A. Electric Arc Furnaces (F1 and F2)****1. Restrictions:**

- a. Continue to comply with all regulatory and Permit requirements. (2102.04.b.5)
- b. The permittee shall not conduct, or allow to be conducted, F1 or F2 process operations unless the furnace pollution control equipment is on line and properly maintained and operated according to the following conditions: (2102.04.b.5, 25 Pa. Code §129.99)
  - 1) F1 and F2 shall be equipped with a direct evacuation control (DEC) system with water cooled ductwork;
  - 2) The fugitive emissions capture equipment shall consist of segmented canopy hood systems exhausting to baghouses C002B and C006, cross-draft partitions, a scavenger duct and closed roofs. The scavenger duct systems 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;
  - 3) The F1 DEC system shall be in place and operating at all times during furnace operations and shall be exhausted to C001 baghouse;
  - 4) The F2 DEC system shall be in place and operating at all times during furnace operations and shall be exhausted to the C002A baghouse
  - 5) F1 and F2 shall be equipped with canopy hoods for collection of process fugitive emissions. Such hoods shall be in operation at all times during process steel making operations and emissions shall be exhausted to the C002B (F2 canopy) baghouse and C006 (F1 canopy) baghouse, respectively;
  - 6) The differential pressure drop across each baghouse compartment shall not exceed 15 in. w.c.;
  - 7) 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.
  - 8) 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.
  - 9) The permittee shall take prompt action to correct any deviation and bring the control equipment back to normal operating parameters.
- c. The permittee shall maintain compliance with 40 CFR Part 63 Subpart YYYYYY. (2102.04.b.5, 25 Pa. Code §129.99)

**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 Site Level Condition IV.14 above entitled "Emissions Testing." (§2103.12.h.1, §2108.02)

**3. Monitoring Requirements:**

- a. The permittee shall check and record the fan motor amperes and damper positions for the F1 and F2 emission control systems on a once-per-shift basis. (§2103.12.i, 40 CFR 60.274a(b), 25 Pa. Code §129.100)
- b. 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. (§2103.12.i, 2102.04.b.5, 40 CFR 60.274a(d) , 25 Pa. Code §129.100)
- c. 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, §2103.12.a.2.D, 25 Pa. Code §129.100)
- d. The permittee shall inspect F1 and F2, the C001 and C002A DEC baghouses, and the C002B canopy and C006 canopy baghouses weekly for to insure proper operation and compliance with permit conditions. (§2103.12.i, 2102.04.b.5, 25 Pa. Code §129.100)

**4. Record Keeping Requirements:**

- a. The permittee shall record and maintain the following data for the F1 and F2 and associated control equipment: (2102.04.b.5, §2103.12.j, 40 CFR §60.276a, 40 CFR 63.10685, 25 Pa. Code §129.100)
  - 1) Monthly operational status inspections;
  - 2) Fan motor amp and damper position data;
  - 3) Monthly and 12-month production for each furnace; and
  - 4) Records of operation, maintenance and inspections.
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.j, §2103.12.h.1, 25 Pa. Code §129.100)
- c. Records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j, 40 CFR §60.276(a), 25 Pa. Code §129.100)

**5. Reporting Requirements:**

- a. The permittee shall report the following information to the Department in its semiannual report. The reports shall contain all required information for the time period of the report: (§2103.12.k, 40 CFR §60.276a, 25 Pa. Code §129.100)
  - 1) Monthly and 12-month summaries of data required to be recorded by Condition V.A.4.a above. Monthly fan motor amperes data shall consist of the monthly maximum and minimum values observed for each fan; and
  - 2) Non-compliance information required to be recorded by Condition V.A.4.b above.

- b. Reporting instances of non-compliance in accordance with Condition V.A.5.a above, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8 above if appropriate. (§2103.12.k)

**6. Work Practice Standards:**

- a. EAFs F1 and F2 shall be: (§210.04.b.5, RACT Order No. 260, Condition 1.3, 25 Pa. Code §129.99)
  - 1) Operated in such a manner as not to cause air pollution that exceeds the permitted limits;
  - 2) Operated and maintained in a manner consistent with good operating and maintenance practices to include but are not limited to; and
    - a) Controlling exhaust flows to reduce the input of outside air; and
    - b) Minimizing opening of the slag door.
  - 3) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

**B. Argon-Oxygen Decarburization Vessel (AOD)****1. Restrictions:**

- a. Continue to comply with all regulatory and Permit requirements. (2102.04.b.5)
- b. The permittee shall not conduct, or allow to be conducted, AOD process operations unless the pollution control system is on-line, properly maintained and operated according to the following conditions: (2102.04.b.5, 40 CFR §60.272a(a), 40 CFR §63.10686(b)(1), 25 Pa. Code §129.99)
  - 1) Emissions from the AOD during process operations shall be exhausted to baghouse C006; and
  - 2) The differential pressure across the baghouse shall not exceed 15 inches w.c.

**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 Site Level Condition IV.14 above entitled "Emissions Testing." (§2103.12.h.1, §2108.02)

**3. Monitoring Requirements:**

- a. The permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture system and baghouse C006 for the AOD. These inspections shall include observations of the physical appearance of the equipment. Any deficiencies shall be noted, and proper maintenance performed. (§2103.12.i, 2102.04.b.5, 40 CFR 60.274a(d) , 25 Pa. Code §129.100)
- b. The permittee shall have instrumentation to continuously monitor the differential pressure drop across each compartment of the C006 Canopy baghouse during operation of the AOD. Said instrumentation shall be properly operated, calibrated and maintained according to manufacturer's specifications. (§2103.12.i, §2102.04.b.5, 25 Pa. Code §129.100)
- c. The permittee shall monitor production on a monthly and 12-month basis. (§2103.12.i, 2102.04.b.5, 25 Pa. Code §129.100)

**4. Record Keeping Requirements:**

- a. The permittee shall record and maintain the following data for the AOD and associated control equipment: (§2102.04.b.5, §2103.12.j, 40 CFR §60.276a, 40 CFR 63.10685, 25 Pa. Code §129.100)
  - 1) Monthly operational status inspections;
  - 2) Monthly and 12-month production for the AOD; and
  - 3) Records of operation, maintenance and inspections.
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.j, §2103.12.h.1, 25 Pa. Code §129.100)

- c. Records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j, 40 CFR §60.276(a), 25 Pa. Code §129.100)

**5. Reporting Requirements:**

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15 above. The reports shall contain all required information for the time period of the report: (§2103.12.k, 25 Pa. Code §129.100)
  - 1) Monthly and 12-month data required to be recorded for Condition V.B.4.a above; and
  - 2) Non-compliance information required to be recorded by Condition V.B.4.b above.
- b. Reporting instances of non-compliance in accordance, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8 above if appropriate. (§2103.12.k)
- c. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15 above. The reports shall contain all required information for the time period of the report: (§2103.12.k, 25 Pa. Code §129.100)

**6. Work Practice Standards:**

- a. The AOD shall be: (§2102.04.b.5, 25 Pa. Code §129.99, RACT Order No. 260, Condition 1.3)
  - 1) Operated in such a manner as not to cause air pollution that exceeds the permitted limits;
  - 2) Operated and maintained in a manner consistent with good operating and maintenance practices; and
  - 3) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

**C. No.2 A & P Line, H<sub>2</sub>SO<sub>4</sub>–HNO<sub>3</sub>/HF Pickling (NO<sub>x</sub> only)**

**1. Restrictions:**

- a. Continue to comply with all regulatory and Permit requirements. (2102.04.b.5)
- b. The permittee shall at no time, conduct or allow to be conducted pickling operations in the No.2 A and P Pickling Tubs No.1, No.2 and No.3 unless all emissions from HNO<sub>3</sub>/HF pickling are processed through the wet chemical packed tower scrubber D-019. The scrubber shall be properly maintained and operated according to the following conditions: (§210.04.b.5, Permit No. 0059-I002, Condition Nos. 26, 27 and 28, 25 Pa. Code §129.99)
  - 1) The pH shall be between 8.0 and 12.5;
  - 2) The scrubbing solution shall be NaOH and NaHS in water;
  - 3) The minimum scrubbing liquid flow-rate shall be 450 gallons per minute;
  - 4) The maximum differential pressure drop across the scrubber shall be 3.0” w.c. The exhaust flow-rate through the scrubber shall be no less than 6,000 acfm at all times;
  - 5) The scrubber shall be equipped with instrumentation that shall at all times continuously monitor pH, scrubbing liquid flow-rate to within 1 gallon per minute of actual and differential pressure drop to within ½” w.c. of the actual pressure drop at all times.
- c. The throughput for No. 2 A and P Line H<sub>2</sub>SO<sub>4</sub> – HNO<sub>3</sub>/HF Pickling, Tubs No.1, No.2 and No.3 shall not exceed 148,920 tons of steel in any consecutive twelve-month period. (§210.04.b.5, 25 Pa. Code §129.99)
- d. Emissions from No. 2 A and P Line H<sub>2</sub>SO<sub>4</sub> – HNO<sub>3</sub>/HF Pickling, Tubs No.1, No.2 and No.3 shall not exceed the emissions limitations in Table V-C-1 below. (§210.04.b.5, 25 Pa. Code §129.99)

**TABLE V-C-1: No. 2 A and P Line H<sub>2</sub>SO<sub>4</sub> – HNO<sub>3</sub>/HF Pickling, Tubs No.1, No.2 & No.3 Emission Limitations**

POLLUTANT	HOURLY EMISSION LIMIT (lb/hr)	ANNUAL EMISSION LIMIT (tons/year)*
Nitrogen Oxides	11.07	48.49

\*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 Site Level Condition IV.14 above entitled “Emissions Testing.” (§2103.12.h.1, §2108.02)

**3. Monitoring Requirements:**

- a. The permittee shall inspect the subject scrubber D019, weekly to ensure compliance with Condition V.C.1.b above. (§2103.12.i, 25 Pa. Code §129.100)

- b. The packed bed scrubbers shall be provided with monitoring instrumentation that shall at all times, continuously monitor the following parameters of the scrubbing liquid in the scrubber. The monitoring instrumentation shall be inspected for proper operation weekly. Calibration shall be conducted as required by manufacturer's instructions to ensure accurate measurements. (§2102.04.b.5, §2103.12.i, 25 Pa. Code §129.100)
- 1) The pressure drop across the scrubber;
  - 2) The scrubbing liquid flow rate;
  - 3) The scrubbing liquid pH within 5%; and
  - 4) The scrubbing liquid ORP.
- c. The permittee shall perform daily visual inspection of emissions while the affected source is operating under normal conditions and weekly inspections of the scrubber for proper operation and to ensure that there is no evidence of chemical attack on its structural integrity. (§2102.04.b.5, §2103.12.i, 25 Pa. Code §129.100).
- d. The permittee shall monitor: (§2103.12.i, 25 Pa. Code §129.100)
- 1) Steel throughput (monthly, and 12-month); and
  - 2) Operation, maintenance, inspection and calibration and/or replacement of process or pollution control equipment.

#### 4. Record Keeping Requirements:

- a. The permittee shall keep and maintain the following data for the No.2 A and P Pickling Tubs No.1, No.2 and No.3 S092C and D: (§2102.04.b.5, §2103.12.j, Permit No. 0059-I002, Condition No. 29, 25 Pa. Code §129.100)
- 1) The throughput in tons of steel (monthly and 12-month);
  - 2) The scrubbing liquid flow-rate (daily, monthly, and 12-month);
  - 3) Differential pressure drop to within ½" w.c. of the actual pressure drop (daily, monthly, average and 12-month);
  - 4) Chemical usage (daily, monthly, and 12-month);
  - 5) Oxidation Reduction Potential (daily, monthly, and 12-month);
  - 6) pH accurate to 5%, (daily, monthly, average and 12-month);
  - 7) Weekly records of the ORP and pH monitoring instrumentation inspection results; and
  - 8) Records of operation, maintenance, inspection, calibration and/or replacement of process or control equipment.
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.h.1, §2103.12.j, 25 Pa. Code §129.100)
- c. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j, 25 Pa. Code §129.100)

**5. Reporting Requirements:**

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15 above. The reports shall contain all required information for the time period of the report: (§2103.12.k, 25 Pa. Code §129.100)
  - 1) Monthly and 12-month data required to be recorded by Condition V.C.4.a above; and
  - 2) Non-compliance information required to be recorded by Condition V.C.4.b above.
- b. Reporting instances of non-compliance in accordance with Condition V.C.5.a above does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8 above, if appropriate. (§2103.12.k)

**6. Work Practice Standards:**

- a. The No.2 A & P Line, H<sub>2</sub>SO<sub>4</sub>-HNO<sub>3</sub>/HF Pickling shall be: (§210.04.b.5, 25 Pa. Code §129.99, RACT Order No. 260, Condition 1.3)
  - 1) Operated in such a manner as not to cause air pollution that exceeds the permitted limits;
  - 2) Operated and maintained in a manner consistent with good operating and maintenance practices; and
  - 3) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

**D. Lewis Temper Mill (VOCs only)**

**1. Restrictions:**

- a. Continue to comply with all regulatory and Permit requirements. (2102.04.b.5)
- b. The production of the Lewis temper mill shall not exceed 219,000 tons of steel in any consecutive twelve-month period. (§2102.04.b.5, 25 Pa. Code §129.99)
- c. The permittee shall not use more than 10,000 gallons of kerosene on the Lewis Temper Mill in any consecutive twelve-month period. (§2102.04.b.5, 25 Pa. Code §129.99)
- d. Maintain production and operating records in compliance with §1.9.A of Consent Decree No. 260 and §2105.06 of Article XXI. (§2105.06, Consent Decree No. 260, 25 Pa. Code §129.100)
- e. Fugitive emissions from the Lewis temper mill shall not exceed the emissions limitations in Table V-D-1 below. (§2102.04.b.5, 25 Pa. Code §129.99)

**TABLE V-D-1: Lewis Temper Mill Emission Limitations**

<b>POLLUTANTS</b>	<b>HOURLY EMISSION LIMIT (lb/hr)</b>	<b>ANNUAL EMISSION LIMIT (tons/year)*</b>
Volatile Organic Compounds	14.00	61.32

\* 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 Site Level Condition IV.14 above entitled “Emissions Testing.” (§2103.12.h.1, §2108.02)

**3. Monitoring Requirements:**

- a. The permittee shall monitor production on a monthly and a rolling 12-month basis. (2103.12.i, 25 Pa. Code §129.100)
- b. The permittee shall monitor kerosene on a monthly and a rolling 12-month basis. (2103.12.i, 25 Pa. Code §129.100)

**4. Record Keeping Requirements:**

- a. The permittee shall record and maintain the following data for Lewis temper mill: (§2102.04.b.5, §2103.12.j., 25 Pa. Code §129.100, RACT Order No. 260, Condition 1.9)
  - 1) Production (monthly, and 12-month);
  - 2) Kerosene usage (monthly, and 12-month); and

- 3) Records of operation, maintenance, inspection and calibration and/or replacement of process equipment.
- b. The permittee shall record all instances of non-compliance with the conditions of this permit upon occurrence along with corrective action taken to restore compliance. (§2103.12.h.1, §2103.12.j, 25 Pa. Code §129.100)
- c. All records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j, 25 Pa. Code §129.100)

**5. Reporting Requirements:**

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15 above. The reports shall contain all required information for the time period of the report: (§2103.12.k, 25 Pa. Code §129.100, )
  - 1) Monthly and 12-month data required to be recorded by Condition V.D.4.a above; and
  - 2) Non-compliance information required to be recorded by Condition V.D.4.b above.
- b. Reporting instances of non-compliance in accordance with Condition V.D.5.a above, does not relieve the permittee of the requirement to report breakdowns in accordance with Site Level Condition IV.8 above, if appropriate. (§2103.12.k)

**6. Work Practice Standards:**

- a. The Lewis Temper Mill shall be: (§2102.04.b.5, 25 Pa. Code §129.99)
  - 1) Operated in such a manner as not to cause air pollution that exceeds the permitted limits;
  - 2) Operated and maintained in a manner consistent with good operating and maintenance practices; and
  - 3) Operated and maintained in accordance with the manufacturer's specifications and the applicable terms and conditions of this permit.

**E. Miscellaneous Paints (VOCs only)**

**1. Restrictions:**

- a. The permittee shall continue to comply with all regulatory and Permit requirements. (2102.04.b.5)
- b. The permittee shall perform miscellaneous painting/coating activities utilizing paints/coatings with a maximum VOC content equal to or less than 5.2 pounds per gallon, less water and exempt solvents, after adjustment to a standard solvent density of 7.36 pounds per gallon and a solids basis. (RACT Order No. 260, Condition 1.10, 25 Pa. Code §129.99)
- c. Emissions from Miscellaneous Paints, based on an annual usage of 4,000 gallons per 12-month period, shall not exceed the emissions limitations in Table V-E-1 below (§2103.12.a.2.B, 25 Pa. Code §129.99)

**TABLE V-E-1: Miscellaneous Paints Emission Limitations**

POLLUTANT	ANNUAL EMISSION LIMIT (tons/year)*
Volatile Organic Compounds	10.4

\*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 Site Level Condition IV.14 above entitled “Emissions Testing.” (§2103.12.h.1, §2108.02)

**3. Monitoring Requirements:**

- a. The permittee shall monitor the following data for miscellaneous paints: (§2102.04.b.5, §2103.12.i, RACT Order No. 260, Condition 1.10, 25 Pa. Code §129.100)
  - 1) Quantity of paints/coatings used at the facility (monthly, 12-month);
  - 2) Density of paints/coatings used at the facility (monthly, 12-month);
  - 3) Water content of paints/coatings used at the facility (monthly, 12-month); and
  - 4) Weight percent of VOCs per gallon of paints/coatings used at the facility. (monthly, 12-month).

**4. Record Keeping Requirements:**

- a. The permittee shall record the following data for miscellaneous paints: (§2102.04.b.5, §2103.12.j, RACT Order No. 260, Condition 1.10, 25 Pa. Code §129.100)
  - 1) Quantity of paints/coatings used at the facility (monthly, 12-month);
  - 2) Density of paints/coatings used at the facility (monthly, 12-month);
  - 3) Water content of paints/coatings used at the facility (monthly, 12-month); and
  - 4) Weight percent of VOCs per gallon of paints/coatings used at the facility. (monthly, 12-month).

- b. Records shall be retained by the facility for at least five (5) years. These records shall be made available to the Department upon request for inspection and/or copying. (§2103.12.j, 25 Pa. Code §129.100)

**5. Reporting Requirements:**

- a. The permittee shall report the following information semiannually to the Department in accordance with General Condition III.15 above. The reports shall contain all required information for the time period of the report: (§2103.12.k, 25 Pa. Code §129.100)
  - 1) Quantity of paint and coatings used at the facility in gallons (monthly, 12-month); and
  - 2) Weight percent of VOCs per gallon of paints/coatings used at the facility. (monthly, 12-month).

**6. Work Practice Standards:**

- a. The permittee shall apply paint and coatings in a manner that minimizes VOC emissions. (§2102.04.b.5, 25 Pa. Code §129.99)
- b. This shall be accomplished by: (§2102.04.b.5, RACT Order No. 260, Condition 1.10, 25 Pa. Code §129.63a)
  - 1) Storing all VOC-containing industrial cleaning solvents and paints, paint brushes, used shop towels and related waste materials in closed and sealed containers.;
  - 2) Ensuring that mixing and storage containers used for VOC-containing industrial cleaning solvents, paints and related waste materials are kept closed at all times except when depositing or removing these materials;
  - 3) Minimizing spills of VOC-containing industrial cleaning solvents, paints and related waste materials and cleaning up spills immediately; and
  - 4) Minimizing air circulation around painting operations to the extent possible.

## VI. ALTERNATIVE OPERATING SCENARIOS

*There are no alternative operating scenarios for this permit*