

New York State Department of Environmental Conservation
Facility DEC ID: 9144800178



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1448-00178/00009
Effective Date: 05/08/2001 Expiration Date: 05/08/2006

Permit Issued To: REPUBLIC TECHNOLOGIES INTERNATIONAL LLC
3770 EMBASSY PARKWAY
AKRON, OH 44333-8367

Contact: LEONARD D. WISNIEWSKI
REPUBLIC TECH INTERNATIONAL LLC
3770 EMBASSY PKY
AKRON, OH 44333-8367
(330) 438-5416

Facility: LACKAWANNA PLANT - 13 INCH BAR MILL
2130 HAMBURG TURNPIKE
HAMBURG, NY 14218

Description:
REPUBLIC TECHNOLOGIES INTERNATIONAL LLC (RTI) MANUFACTURES STRAIGHT-LENGTH BAR AND COIL BAR STEEL PRODUCTS AT ITS BUFFALO, NY FACILITY. INDUSTRIAL PROCESSES BEING PERFORMED AT THE FACILITY INCLUDE THE USE OF A LARGE REHEAT FURNACE TO HEAT STEEL BILLETS VIA A WALKING BEAM, VARIOUS VERTICAL AND HORIZONTAL ROLLING STANDS, A PICKLING LINE AND COMBUSTION UNITS FOR STEAM PRODUCTION.

AIR EMISSION SOURCES AT THE FACILITY CONSIST OF THE BILLET REHEAT FURNACE, TWO BOILERS, AND THE SULFURIC ACID PICKLING LINE WHICH INCLUDES A WATER SCRUBBER TO REDUCE SULFURIC ACID EMISSIONS.

AS A RESULT OF THIS APPLICATION, RTI IS REQUESTING TO INCLUDE NATURAL GAS AS A BACKUP FUEL FOR THE TWO (2) BOILERS (EU02, EP63102 AND EP63103). PRESENTLY, THE BOILERS OPERATE MAINLY ON COKE OVEN GAS (COG) SUPPLIED FROM THE BETHENERGY COKE OVENS.

THIS FACILITY IS A MAJOR SOURCE FOR CARBON MONOXIDE, OXIDES OF NITROGEN AND SULFUR DIOXIDE. SULFUR DIOXIDE EMISSIONS ARE REDUCED BY THE SULFUR CONTENT LIMITS PLACED ON THE COAL BEING USED IN THE BETHENERGY COKE OVENS. CARBON MONOXIDE EMISSIONS ARE ASSOCIATED WITH THE COMBUSTION OF GASES USED IN THE BOILERS AND THE REHEAT FURNACE. CURRENTLY, THE EMISSION RATE OF CARBON MONOXIDE IS NOT AT A LEVEL THAT WOULD REQUIRE FURTHER EMISSION REDUCTIONS. OXIDES OF NITROGEN ARE LIMITED VIA 6NYCRR PART 227-2 FOR THE TWO BOILERS AND 6NYCRR PART 216 FOR THE REHEAT FURNACE. THIS

FINAL



New York State Department of Environmental Conservation
Facility DEC ID: 9144800178

PERMIT CONTAINS THE MONITORING, RECORDKEEPING , AND REPORTING REQUIREMENTS NECESSARY TO PROVE CONTINUOUS COMPLIANCE WITH ALL PERMIT LIMITS.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: RICHARD P. SWEENEY
270 MICHIGAN AVE
BUFFALO, NY 14203-2999

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees, agents, and assigns for all claims, suits, actions, damages, and costs of every name and description, arising out of or resulting from the permittee's undertaking of activities or operation and maintenance of the facility or facilities authorized by the permit in compliance or non-compliance with the terms and conditions of the permit.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

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General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 9
HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305.

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for

New York State Department of Environmental Conservation
Facility DEC ID: 9144800178



modification, suspension or revocation include:

- a) the scope of the permitted activity described in the application is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

Condition 5: Permit Modifications, Suspensions, and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 5.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

****** Facility Level ******

Condition 6: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 6.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 9 Headquarters
Division of Environmental Permits
270 Michigan Avenue
Buffalo, NY 14203-2999
(716) 851-7165



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 Sealing
- 2 Acceptable ambient air quality
- 3 Maintenance of equipment
- 4 Unpermitted Emission Sources
- 5 Unavoidable Noncompliance and Violations
- 6 Emergency Defense
- 7 Recycling and Salvage
- 8 Prohibition of Reintroduction of Collected Contaminants to the Air
- 9 Public Access to Recordkeeping for Title V facilities
- 10 Proof of Eligibility
- 11 Proof of Eligibility
- 12 Applicable Criteria, Limits, Terms, Conditions and Standards
- 13 Cessation or Reduction of Permitted Activity Not a Defense
- 14 Compliance Requirements
- 15 Federally-Enforceable Requirements
- 16 Fees
- 17 Monitoring, Related Recordkeeping and Reporting Requirements
- 18 Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements
- 19 Permit Shield
- 20 Property Rights
- 21 Reopening for Cause
- 22 Right to Inspect
- 23 Severability
- 24 Emission Unit Definition
- 26 Compliance Certification
- 27 Compliance Certification
- 25 Permit Exclusion Provisions
- 28 Required emissions tests
- 29 Compliance Certification
- 30 Recordkeeping requirements
- 31 Visible emissions limited.
- 32 Open Fires Prohibited at Industrial and Commercial Sites
- 33 Recycling and Emissions Reduction

Emission Unit Level

- 34 Emission Point Definition By Emission Unit
- 35 Process Definition By Emission Unit
- 36 Compliance Certification (EU=0-0EU01,EP=63101)
- 37 Compliance Certification (EU=0-0EU01,EP=63101)
- 38 Compliance Certification (EU=0-0EU01,EP=63101)
- 39 Compliance Certification (EU=0-0EU01,EP=63101)



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

- 40 Compliance Certification (EU=0-0EU01,EP=63101)
- 41 Compliance Certification (EU=0-0EU02)
- 42 Compliance Certification (EU=0-0EU02)
- 43 Compliance Certification (EU=0-0EU02)
- 44 Compliance Certification (EU=0-0EU02)
- 45 Compliance Certification (EU=0-0EU04,EP=63501)
- 46 Compliance Certification (EU=0-0EU04,EP=63501)

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 47 General Provisions
- 48 Contaminant List
- 49 Air pollution prohibited

Authorized Activity By Standard Industrial Classification Code:

3312 - BLAST FURNACES AND STEEL MILLS

Permit Effective Date: 05/08/2001

Permit Expiration Date: 05/08/2006



New York State Department of Environmental Conservation
Permit ID: 9-1448-00178/00009 Facility DEC ID: 9144800178

FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

Condition 1: Sealing
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 200.5

Item 1.1:

(a) The commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the commissioner issued in the case of the violation. Sealing means labelling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

(b) No person shall operate any air contamination source sealed by the commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 2: Acceptable ambient air quality
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 200.6

Item 2.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the commissioner shall specify the degree and/or method of emission control required.

Condition 3: Maintenance of equipment
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 200.7

Item 3.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

Condition 4: Unpermitted Emission Sources
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 4.1:

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Condition 5: Unavoidable Noncompliance and Violations
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-1.4

Item 5.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

- (a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit or certificate issued for the corresponding air contamination source. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.
- (b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

Condition 6: Emergency Defense
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 6.1:

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Condition 7: Recycling and Salvage
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-1.7



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

Item 7.1:

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Condition 8: Prohibition of Reintroduction of Collected Contaminants to the Air

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 8.1:

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 9: Public Access to Recordkeeping for Title V facilities

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-1.10(b)

Item 9.1:

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Condition 10: Proof of Eligibility

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-3.2(a)

Item 10.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Condition 11: Proof of Eligibility

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-3.3(a)

Item 11.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Condition 12: Applicable Criteria, Limits, Terms, Conditions and Standards
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 12.1:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in the permit. This shall include:

- i. Any reporting requirements and operations under an accidental release plan, response plan, and compliance plan as approved as of the date of the permit issuance, or
- ii. Any support documents submitted as a part of the permit application for this facility as accepted and approved as of the date of permit issuance.

Any noncompliance with the federally-enforceable portions of this permit constitutes a violation of the federal Clean Air Act and will be grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

Item 12.2:

Any document, including reports, required by the federally-enforceable portions of this permit shall contain a certification by the responsible official for this facility as set forth in Section 201-6.3 that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

Condition 13: Cessation or Reduction of Permitted Activity Not a Defense
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 13.1:

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Condition 14: Compliance Requirements
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

Item 14.1:

The following information must be included in any required compliance monitoring records and reports:

- i. The date, place and time of sampling or measurements;
- ii. The date(s) analyses were performed;
- iii. The company or entity that performed the analyses;
- iv. The analytical techniques or methods used including quality assurance and quality control procedures if required;
- v. The results of such analyses including quality assurance data where required; and
- vi. The operating conditions as existing at the time of sampling or measurement;

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by the responsible official, consistent with Section 201-6.3 of Part 201.

Item 14.2:

The permittee shall comply with the approved compliance schedule for this permit if such a schedule is a part of this permit. Risk management plans must be submitted to the Administrator if required by Section 112(r) of the Clean Air Act for this facility.

Item 14.3:

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. Such progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- ii. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 15: Federally-Enforceable Requirements
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 15.1:

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



Condition 16: Fees
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 16.1:

The permittee shall pay the required fees associated with this permit.

Condition 17: Monitoring, Related Recordkeeping and Reporting Requirements
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 17.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 18: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 18.1:

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not relieve the permittee from the requirement to comply with any condition contained in this permit.

The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The permittee shall also, on request, furnish the Department with copies of records required to be kept by the permit. Where information is claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

Condition 19: Permit Shield
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

Item 19.1:

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield. For those facilities for which a permit shield has been granted, compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Condition 20: Property Rights

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 20.1:

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

Condition 21: Reopening for Cause

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 21.1:

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Item 21.2:

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Item 21.3:

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Condition 22: Right to Inspect

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 22.1:

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

i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

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

iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 23: Severability

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 23.1:

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



challenge, the remainder of this permit shall continue to be valid.

Condition 24: Emission Unit Definition
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 24.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU01

Emission Unit Description:

THE BILLET REHEAT FURNACE, DESIGNED AND INSTALLED BY THE SALEM FURNACE COMPANY IN 1976, IS A 590 MMBTU/HR, SIX ZONE, WALKING BEAM FURNACE FIRED WITH NATURAL GAS. REPUBLIC TECHNOLOGIES INTERNATIONAL LLC IS REQUESTING TO MAINTAIN COKE OVEN GAS (COG) AS A BACKUP FUEL FOR THE REHEAT FURNACE. THE ORIGINAL CERTIFICATE TO OPERATE WAS ISSUED BASED ON A MIXTURE OF COG AND NATURAL GAS. AN ALTERNATE OPERATING SCENARIO FOR THE UTILIZATION OF COG IS INCLUDED IN APPENDIX J.

Building(s): 13BARMILL

Item 24.2:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU02

Emission Unit Description:

BOILER #1 AND BOILER #2 ARE MANUFACTURED BY ZURN INDUSTRIES. THEY HAVE A RATED CAPACITY OF 139 MMBTU/HR AND FIRE COKE OVEN GAS AS THEIR PRIMARY FUEL. THE SECONDARY FUEL IS NATURAL GAS. THE STEAM PRODUCED BY THE BOILERS IS USED BY THE 13" BAR MILL AND/OR SOLD TO OTHER BETHLEHEM STEEL OPERATIONS.

Building(s): 13BARMILL

Item 24.3:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-0EU04

Emission Unit Description:

13" BAR MILL COIL PICKLING FACILITY: COILS ARE PICKLED IN A SULFURIC ACID BATH WITH THE FUMES BEING COLLECTED AND DISCHARGED

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



THROUGH AN ACID MIST FILTER. THERE ARE
FOUR (4) SULFURIC ACID TANKS.

Building(s): 13BARMILL

Condition 26: Compliance Certification
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)

Condition 27: Compliance Certification
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Compliance certifications shall contain the following information:

- the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;
- and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



Department.

All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

270 Michigan Avenue
Buffalo, NY 14203-2999

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring
and Enforcement
50 Wolf Road
Albany, NY 12233-3258

Reporting Requirements: ANNUALLY (CALENDAR YEAR)
Reports due by January 30th for previous calendar year

Condition 25: Permit Exclusion Provisions
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(g)

Item 25.1:

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR), and particularly any such enforcement action as may be authorized pursuant to 6 NYCRR 201-1.2 and 6 NYCRR 201-6.5(g).



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

The issuance of this permit by the Department and the receipt thereof by the Applicant does not supercede, revoke or rescind an order or modification thereof on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements contained in such order or modification thereof unless specifically intended by this permit.

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting the right of the Department to bring any future action, or pursue any pending action, either administrative or judicial, to required remediation, contribution for costs incurred or funds expended, for any violations, past, present or future, known or unknown, of applicable federal law, the ECL, or the rules and regulations promulgated thereunder, or conditions contained in any other licenses or permits issued to the Applicant and not addressed in this permit.

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting the right of the Department to pursue any claims for natural resource damages against the Applicant.

Condition 28: Required emissions tests
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 28.1:

An acceptable report of measured emissions shall be submitted, as may be required by the commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Condition 29: Compliance Certification
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

Reporting Requirements: ANNUALLY (CALENDAR YEAR)

Reports due by April 15th for previous calendar year

Condition 30: Recordkeeping requirements

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 30.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 31: Visible emissions limited.

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 211.3

Item 31.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 32: Open Fires Prohibited at Industrial and Commercial Sites

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 215.

Item 32.1:

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

Condition 33: Recycling and Emissions Reduction

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 33.1:

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVAC's in Subpart B:



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR Part 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR Part 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR Part 82.161.
- d. Persons disposing of small appliances, MVAC's, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR Part 82.166. ("MVAC-like appliance as defined at 40 CFR Part 82.152)
- e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR Part 82.156.
- f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR Part 82.166.

****** Emission Unit Level ******

**Condition 34: Emission Point Definition By Emission Unit
Effective between the dates of 05/08/2001 and 05/08/2006**

Applicable Federal Requirement: 6NYCRR 201-6.

Item 34.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU01

Emission Point: 63101

Height (ft.): 120

Diameter (in.): 144

NYTMN (km.): 4745.92

NYTME (km.): 185.729

Building: 13BARMILL

Item 34.2:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU02

Emission Point: 63102

Height (ft.): 83

Diameter (in.): 68

20

NYTMN (km.): 4745.92

NYTME (km.): 185.829

Building: 13BARMILL

Emission Point: 63103

Height (ft.): 83

Diameter (in.): 68

NYTMN (km.): 4745.92

NYTME (km.): 185.829

Building: 13BARMILL

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



Item 34.3:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-0EU04

Emission Point: 63501

Height (ft.): 40

Diameter (in.): 390

NYTMN (km.): 4745.82 NYTME (km.): 186.129 Building: 13BARMILL

Condition 35: Process Definition By Emission Unit

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 35.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU01

Process: 007

Source Classification Code: 3-03-009-33

Process Description:

The Billet reheat furnace, designed and installed by the Salem Furnace Company in 1976, is a 590 mmBtu/hr, six zone, walking beam furnace fired with natural gas. The process entails the heating of billets to optimal rolling temperature based on size, grade, and application.

Emission Source/Control: ES001 - Combustion

Design Capacity: 590 million Btu per hour

Item 35.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU02

Process: 001

Source Classification Code: 1-02-004-01

Process Description: Emission point 63102

Emission Source/Control: ES02A - Combustion

Design Capacity: 139 million Btu per hour

Emission Source/Control: ES02B - Combustion

Design Capacity: 139 million Btu per hour

Item 35.3:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU02

Process: 002

Source Classification Code: 1-02-007-07



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

Process Description:

Boiler #1 and Boiler #2 are manufactured by Zurn Industries. They have a rated capacity of 139 mmBTU/hr and fire coke oven gas as their primary fuel. The secondary fuel is natural gas. The steam produced by the boilers is used by the 13" Bar Mill and/or sold to other Bethlehem Steel operations.

Emission Source/Control: ES02A - Combustion

Design Capacity: 139 million Btu per hour

Emission Source/Control: ES02B - Combustion

Design Capacity: 139 million Btu per hour

Item 35.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU04

Process: 005

Source Classification Code: 3-90-006-89

Process Description: Pickle House/Anneal furnace

Emission Source/Control: PICKL - Process

Item 35.5:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-0EU04

Process: 009

Source Classification Code: 3-03-009-10

Process Description:

13" Bar Mill Coil Pickling Facility: Coils are pickled in a sulfuric acid bath to clean and remove scale with the fumes being collected and discharged through an acid mist filter. There are four (4) sulfuric acid tanks.

Emission Source/Control: 63501 - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: PICKL - Process

Condition 36: Compliance Certification

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 216.4

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01 Emission Point: 63101

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



Regulated Contaminant:

CAS No: 0NY075-00-0

Name: PARTICULATES

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

RTI WILL OPERATE THE REHEAT FURNACE IN A MANNER CONSISTENT WITH GOOD OPERATING AND MAINTENANCE PRACTICES, ELIMINATING AND/OR MINIMIZING ANY VISIBLE EMISSIONS THAT MAY EXCEED OPACITY LIMITS. FOR EXAMPLE, RTI MAINTAINS AN SOP FOR THE REHEAT FURNACE (EP63101) WHICH CONTAINS 20PROCEDURES FOR MAINTENANCE AND ANY NECESSARY CALIBRATION EVERY TWO (2) YEARS. THIS MAINTENANCE AND CALIBRATION SCHEME IS DOCUMENTED. STACK EMISSIONS ARE INFORMALLY OBSERVED DAILY BY PLANT PERSONNEL. DAILY SHALL BE DEFINED AS DURING REGULAR BUSINESS HOURS (MONDAY THROUGH FRIDAY, 9 AM- 5 PM).

STACK EMISSIONS MUST BE OBSERVED ON A DAILY BASIS. IF PLANT PERSONNEL OBSERVE VISIBLE EMISSIONS BEYOND 20 PERCENT, THEY WILL RECORD THIS OBSERVATION, NOTIFY MANAGEMENT, AND CORRECTIVE ACTIONS WILL BE TAKEN AS WARRANTED.

DAILY RECORDS OF STACK OBSERVATIONS MUST BE MAINTAINED ON-SITE FOR A PERIOD OF FIVE YEARS.

THE DEPARTMENT RESERVES THE RIGHT TO PERFORM OR REQUIRE THE PERFORMANCE OF A METHOD 9 OPACITY EVALUATION.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Reference Test Method: EPA METHOD 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 37: Compliance Certification

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 216.5

Item 37.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01 Emission Point: 63101

Regulated Contaminant:

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

RECORDS OF THE FOLLOWING PROCESS CONTROL
PARAMETERS SHALL BE MAINTAINED:

- FUEL USAGE

- STRIP CHARTS (OR EQUIVALENT)

RECORDING THE FUEL FLOWS FOR EACH OF THE
SIX (6) FURNACE ZONES

- STRIP CHARTS (OR EQUIVALENT)

RECORDING THE AIR FLOWS FOR EACH OF THE
SIX (6) FURNACE ZONES

- STRIP CHARTS (OR EQUIVALENT)

RECORDING THE TEMPERATURE FOR EACH OF THE
SIX (6) FURNACE ZONES

SETUP AND OPERATION OF THE REHEAT FURNACE
SHALL BE IN ACCORDANCE WITH THE NORMAL
OPERATING PARAMETERS AND ROLLING
TEMPERATURES (APPROXIMATE) OUTLINED IN
THE PROCESS CONTROL REFERENCE FOR
SPECIFIC GRADES OF STEEL.

MAINTENANCE AND CALIBRATION OF EQUIPMENT,
INCLUDING TEMPERATURE THERMOCOUPLES AND

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



OXYGEN SENSOR, SHALL BE IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS. A QA/QC PLAN, AS APPROVED BY THE DEPARTMENT, SHALL INCLUDE CALIBRATION RECORDS AND SHALL BE IN ACCORDANCE WITH THE REQUIREMENTS OF 40 CFR PART 60, APPENDIX B, AND/OR THE CERTIFIED ISO 9000 REQUIREMENT. THE DIFFERENTIAL PRESSURE TRANSDUCERS SHALL BE CHECKED IN ACCORDANCE WITH MANUFACTURER'S SPECIFICATIONS.

A MAINTENANCE LOG SHALL BE MAINTAINED TO RECORD MAINTENANCE ITEMS AND FREQUENCIES, ADJUSTMENTS, OR REPLACEMENT OF COMPONENTS RELATED TO THE COMBUSTION PERFORMANCE OF THE REHEAT FURNACE.

ALL RECORDS MUST BE MAINTAINED ON SITE FOR A PERIOD OF FIVE YEARS.

A STACK TEST TO DETERMINE COMPLIANCE WITH THE 0.20 LB/MMBTU NO_x LIMITATION SHALL BE PERFORMED TWICE DURING THE TERM OF THE PERMIT.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 38: Compliance Certification
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 216.5

Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01 Emission Point: 63101

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A NO_x RACT COMPLIANCE PLAN ADDRESSING THE CONSUMPTION OF COKE OVEN GAS WILL BE SUBMITTED TO THE DEPARTMENT PRIOR TO

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



UTILIZING THIS FUEL IN THE REHEAT
FURNACE.

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 39: Compliance Certification
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 216.5

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01 Emission Point: 63101

Regulated Contaminant:

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

EFFECTIVE MAY 31, 1995, THE NO_x EMISSION
LIMIT FOR THE REHEAT FURNACE IS 0.20
LBS/MMBTU, AS IT IS FIRED VIA NATURAL
GAS. IN ATTACHMENT III OF THE RACT
COMPLIANCE PLAN FOR THE REHEAT FURNACE,
DATED MARCH 20, 1996, THE MANUFACTURER'S
MAXIMUM PROJECTED EMISSION RATE IS
INDICATED AS 0.18 LBS/MMBTU.

RTI SHALL PERFORM A NO_x EMISSION TEST ON
THE REHEAT FURNACE A MINIMUM OF TWO TIMES
DURING THE PERMIT TERM. PRIOR TO
PERFORMANCE OF THE TEST, RTI SHALL SUBMIT
AN EMISSION TESTING PROTOCOL TO THE
DEPARTMENT FOR REVIEW AND APPROVAL.
AFTER DEPARTMENT APPROVAL OF THE TESTING
PROTOCOL, RTI SHALL NOTIFY THE DEPARTMENT
60 DAYS PRIOR TO THE EXPECTED DATE OF THE
TEST.

A REPORT OF THE RESULTS OF THE NO_x
EMISSION TEST SHALL BE SUBMITTED TO THE



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

DEPARTMENT WITHIN 45 DAYS AFTER THE TEST DATE.

ALL REPORTS AND RECORDS MUST BE MAINTAINED FOR A PERIOD OF FIVE YEARS.

Upper Limit of Monitoring: 0.2 pounds per million Btus

Reference Test Method: EPA METHODS 7-7E

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 40: Compliance Certification
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 216.5

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01 Emission Point: 63101

Regulated Contaminant:

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

RTI WILL CONTINUOUSLY FOLLOW THE MAINTENANCE, MONITORING, AND EMISSION TESTING REQUIREMENTS CONTAINED IN THIS PERMIT TO ASSURE COMPLIANCE WITH THE NO_x LIMIT.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: NATURAL GAS

Upper Limit of Monitoring: 0.2 pounds per million Btus

Reference Test Method: EPA METHODS 7-7E

Monitoring Frequency: DAILY

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR YEAR)

Reports due 30 days after every 6 calendar months (January - June, July - December)



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

Condition 41: Compliance Certification

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 227-1.3

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

RTI WILL OPERATE THE BOILERS IN A MANNER
CONSISTENT WITH GOOD OPERATING AND
MAINTENANCE PRACTICES, ELIMINATING AND/OR
MINIMIZING ANY VISIBLE EMISSIONS THAT MAY
EXCEED OPACITY LIMITS. RTI MAINTAINS AN
SOP FOR THE BOILERS WHICH CONTAINS
PROCEDURES FOR MAINTENANCE AND ANY
NECESSARY CALIBRATION EVERY TWO YEARS.
THE DEPARTMENT RESERVES THE RIGHT TO HAVE
RTI PERFORM AN EPA METHOD 9 TEST AT ANY
TIME.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 42: Compliance Certification

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 227-2.4(b)(2)

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

Regulated Contaminant:

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

IN ACCORDANCE WITH THE ABOVE CITATION, RACT WAS IDENTIFIED AND PROPOSED FOR EACH APPLICABLE EMISSION POINT (I.E., EP63102 & EP63103). A RACT COMPLIANCE PLAN WAS SUBMITTED FOR THE TWO BOILERS, AMONG OTHER SOURCES, ON NOVEMBER 23, 1994. THIS CORRESPONDENCE WAS SUBMITTED FROM T.W. EASTERLY, OF BETHLEHEM STEEL CORPORATION TO STANLEY GUBNER, OF THE NYSDEC.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: NATURAL GAS

Upper Limit of Monitoring: 0.3 pounds per million Btus

Reference Test Method: EPA METHODS7-7E

Monitoring Frequency: MONTHLY

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 43: Compliance Certification

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 227-2.4(b)(2)

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

Regulated Contaminant:

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

IN ACCORDANCE WITH THE ABOVE CITATION, RACT WAS IDENTIFIED AND PROPOSED FOR EACH

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



APPLICABLE EMISSION POINT (I.E., EP63102 & EP63103). A RACT COMPLIANCE PLAN WAS SUBMITTED FOR THE TWO BOILERS, AMONG OTHER SOURCES, ON NOVEMBER 23, 1994. THIS CORRESPONDENCE WAS SUBMITTED FROM T.W. EASTERLY, OF BETHLEHEM STEEL CORPORATION TO STANLEY GUBNER, OF THE NYSDEC.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: COKE OVEN GAS
Upper Limit of Monitoring: 0.3 pounds per million Btus
Reference Test Method: EPA METHODS7-7E
Monitoring Frequency: MONTHLY
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 44: Compliance Certification
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 227-2.6(a)(3)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

Regulated Contaminant:

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

RTI PROPOSES THAT THE SOURCE TESTING EVENT AND RECORDKEEPING OF FUEL AND PRODUCTION DATA SERVE AS A DEMONSTRATION OF COMPLIANCE IN LIEU OF FUTURE STACK TESTS. THE SOURCE TESTING EVENT REPORT IS DATED JANUARY 1998. RECORDS WILL BE MAINTAINED ON SITE FOR A PERIOD OF FIVE YEARS.

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



Condition 45: Compliance Certification

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU04 Emission Point: 63501

Regulated Contaminant:

CAS No: 007664-93-9

Name: SULFURIC ACID

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

RTI WILL MONITOR THE FLOW OF WATER TO
THE FILTERS AND THE FILTERS (VISUAL
INSPECTION ACCORDING TO THE STANDARD
OPERATING PROCEDURES DEFINED BY THE
MANUFACTURER, WITH A YEARLY REPLACEMENT
SCHEDULE OF THE FILTERS) ASSOCIATED WITH
THE DEMISTER FOR EP63501 (AS PROPOSED AS
A COMPLIANCE CERTIFICATION FOR PART
212.4), WHICH WILL INDICATE PROPER
OPERATION OF THE CONTROL DEVICE TO THE
REQUIRED SULFURIC ACID REMOVAL EFFICIENCY
OF 91 PERCENT IN ACCORDANCE WITH 6 NYCRR
PART 212 TABLE 2 FOR B RATED
CONTAMINANTS.

RECORDS OF ALL REQUIRED MONITORING AND
MAINTENANCE SHALL BE MAINTAINED ON SITE
FOR A PERIOD OF FIVE YEARS.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Parameter Monitored: WATER

Lower Limit of Monitoring: 100 gallons per minute

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Condition 46: Compliance Certification
Effective between the dates of 05/08/2001 and 05/08/2006

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU04 Emission Point: 63501

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Limit of Monitoring: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

Condition 47: General Provisions

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable State Requirement: 6NYCRR 201-5.

Item 47.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 47.2:

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

Item 47.3:

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Condition 48: Contaminant List

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable State Requirement: 6NYCRR 201-5.3(b)

Item 48.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit (emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 007664-93-9

Name: SULFURIC ACID

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN



New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178

Condition 49: Air pollution prohibited

Effective between the dates of 05/08/2001 and 05/08/2006

Applicable State Requirement: 6NYCRR 211.2

Item 49.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.