



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1448-00178/00009
Effective Date: 10/01/2012 Expiration Date: 09/30/2017

Permit Issued To: REPUBLIC STEEL
2633 EIGHTH ST NE
CANTON, OH 44704

Contact: ADAM C SKIPPER
REPUBLIC ENGINEERED PRODUCTS INC.
3049 LAKESHORE RD
BUFFALO, NY 14219
(716) 863-9476

Facility: LACKAWANNA PLANT- REPUBLIC STEEL
3049 LAKESHORE RD
BLASDELL, NY 14219-1447

Contact: ADAM C SKIPPER
REPUBLIC ENGINEERED PRODUCTS INC.
3049 LAKESHORE RD
BUFFALO, NY 14219
(716) 863-9476

Description:

Republic Engineered Products, Inc. (Republic) manufactures SBQ Bar and Coil Bar steel products, primarily for the automotive industry, at its Lackawanna, NY facility. Industrial operations being performed at the facility include: a natural gas fired, walking beam Reheat Furnace to heat steel billets and a 13" Rolling Mill with numerous vertical and horizontal mill stands, coilers and cooling beds. Further, there are a number of product finishing operations: including natural gas fired end heating stations, quality verification stations, a coil stacker and warehousing & shipping units. The plant has a met lab, a roll shop, a water treatment facility and 2 natural gas fired boilers for steam production. A contractor operates a scrap preparation operation on Republic's property.

This facility is a major source for Carbon Monoxide (CO) and Oxides of Nitrogen (NOx). CO and NOx emissions are associated with the combustion of gases used in the boilers and the reheat furnace. Currently, the emissions rate of CO is not at a level that would require further emission reductions. NOx emissions are limited via 6NYCRR Part 227-2 for the two large boilers and 6NYCRR Part 216.5 for the reheat furnace. This permit contains the monitoring and recordkeeping requirements necessary to demonstrate that Republic is in continuous compliance with that limit. There is also one 32 mmBtu/hr natural gas boiler that Republic rents for supplemental heat. Due to ducting constraints, this boiler can not exceed 20 mmBtu/hr.



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: LISA PORTER
 270 MICHIGAN AVE
 BUFFALO, NY 14203-2915

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State 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 and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

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

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



DEC GENERAL CONDITIONS

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

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

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, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

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.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be



submitted prior to actual transfer of ownership.

Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

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

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

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 14203-2915
(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

IDENTIFICATION INFORMATION

Permit Issued To: REPUBLIC STEEL
2633 EIGHTH ST NE
CANTON, OH 44704

Facility: LACKAWANNA PLANT- REPUBLIC STEEL
3049 LAKESHORE RD
BLASDELL, NY 14219-1447

Authorized Activity By Standard Industrial Classification Code:
3312 - BLAST FURNACES AND STEEL MILLS

Permit Effective Date: 10/01/2012

Permit Expiration Date: 09/30/2017



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.5 (a) (7): Fees
- 3 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
- 4 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 202-2.1: Compliance Certification
- 7 6 NYCRR 202-2.5: Recordkeeping requirements
- 8 6 NYCRR 215.2: Open Fires - Prohibitions
- 9 6 NYCRR 200.7: Maintenance of Equipment
- 10 6 NYCRR 201-1.7: Recycling and Salvage
- 11 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 12 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 13 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 14 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
- 15 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
- 16 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
- 17 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
- 18 6 NYCRR 202-1.1: Required Emissions Tests
- 19 40 CFR Part 68: Accidental release provisions.
- 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 21 6 NYCRR Subpart 201-6: Emission Unit Definition
- 22 6 NYCRR 201-6.5 (e): Compliance Certification
- 23 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

- 24 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 25 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=0-0EU01,EP=63101

- 26 6 NYCRR 216.4: Compliance Certification
- 27 6 NYCRR 216.5: Compliance Certification
- 28 6 NYCRR 216.5: Compliance Certification
- 29 6 NYCRR 216.5: Compliance Certification
- 30 6 NYCRR 216.5: Compliance Certification

EU=0-0EU02

- 31 6 NYCRR 227-1.3: Compliance Certification
- 32 6 NYCRR 227-2.6 (c): Compliance Certification
- 33 6 NYCRR 227-2.6 (c): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 34 ECL 19-0301: Contaminant List



35 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
Emission Unit Level

EU=0-0EU05

36 6 NYCRR 227-2.4 (d): Compliance Demonstration



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6 NYCRR 201-1.5

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.

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)

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 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.3 (a) (4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR 201-6.3 (d) (12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR 201-6.5 (a) (2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.5 (a) (3)

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 stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5 (a) (5)

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.

Item H: Property Rights - 6 NYCRR 201-6.5 (a) (6)

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



Item I: Severability - 6 NYCRR 201-6.5 (a) (9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR 201-6.5 (g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. 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.

Item K: Reopening for Cause - 6 NYCRR 201-6.5 (i)

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 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.

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.

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.

Item L: Permit Exclusion - ECL 19-0305

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 legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, 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). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: **Federally Enforceable Requirements - 40 CFR 70.6 (b)**
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.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:
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 2: Fees
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (7)

Item 2.1:
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 10/01/2012 and 09/30/2017

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

Item 3.1:



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 a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement: 6 NYCRR 201-6.5 (c) (2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, 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 5: Compliance Certification

Effective between the dates of 10/01/2012 and 09/30/2017

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

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.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A



written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

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 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 Quality Assurance (BQA) 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.

Monitoring Frequency: SEMI-ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).



Condition 6: Compliance Certification
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

Condition 7: Recordkeeping requirements
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 7.1:

(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 8: Open Fires - Prohibitions
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement:6 NYCRR 215.2

Item 8.1:

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 8.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

(a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter



and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.

- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

**Condition 9: Maintenance of Equipment
Effective between the dates of 10/01/2012 and 09/30/2017**

Applicable Federal Requirement: 6 NYCRR 200.7

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 20: Recycling and Emissions Reduction
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement:40CFR 82, Subpart F

Item 20.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 21: Emission Unit Definition
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 21.1:

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

Emission Unit: 0-OEU01

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. The process entails the heating of billets to optimal rolling temperature based on size, grade, and application. For product quality reasons, the furnace is not capable of simultaneously firing all six zones at their maximum firing rates.



Building(s): 13BARMILL

Item 21.2:

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

Emission Unit: 0-0EU02

Emission Unit Description:

Boiler #1 and Boiler #2 were manufactured by Zurn Industries. They have a rated capacity of 139 mmbtu/hr and fire natural gas.

Building(s): 13BARMILL

Item 21.3:

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

Emission Unit: 0-0EU05

Emission Unit Description:

32 mmBtu/hr Cleaver Brooks model CBR 200-800LE natural gas fired package boiler.

Building(s): 13BARMILL

Condition 22: Compliance Certification

Effective between the dates of 10/01/2012 and 09/30/2017

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

Item 22.1:

The Compliance Certification activity will be performed for the Facility.

Item 22.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - 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.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. 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 Department.

iv. 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 Quality Assurance (BQA) 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 14203-2915

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due on the same day each year



Condition 23: Air pollution prohibited
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement:6 NYCRR 211.1

Item 23.1:

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.

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

Condition 24: Emission Point Definition By Emission Unit
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 24.1:

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 24.2:

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

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

Item 24.3:

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

Emission Unit: 0-0EU05

Emission Point: 63104



Height (ft.): 83 Diameter (in.): 68
NYTMN (km.): 4745.982 NYTME (km.): 185.95 Building: 13BARMILL

Condition 25: Process Definition By Emission Unit
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 25.1:

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 25.2:

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 25.3:

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

Process Description:

Boiler #1 and Boiler #2 are manufactured by Zurn Industries. They each have a rated capacity of 139 mmBTU/hr and fire natural gas.

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 25.4:

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

Emission Unit: 0-0EU05
Process: 003 Source Classification Code: 1-02-006-02
Process Description:
The package boiler is a Cleaver Brooks model CBR
200-800LE unit rated at 32 mmBtu/hr and uses natural gas.
The package boiler will provide steam for space heat and
steam traced water piping during the winter months.

Emission Source/Control: ES003 - Combustion
Design Capacity: 32 million BTUs per hour

Condition 26: Compliance Certification
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement: 6 NYCRR 216.4

Item 26.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01 Emission Point: 63101
Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 26.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Republic 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. Republic's quality and environmental management systems (QMS & EMS) contain procedures and practices for the proper maintenance of the Reheat Furnace including any necessary calibration requirements. This maintenance and calibration regimen is documented within the QMS & EMS.

Stack emissions are informally (not by method 9) observed weekly by plant personnel. If they observe visible emissions suspected at greater than 20 percent opacity, they will record this observation, notify management, and take corrective actions as warranted.

Records of stack observations must be maintained on-site for a period of five years.

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA METHOD 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Certification
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement: 6 NYCRR 216.5

Item 27.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01 Emission Point: 63101

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Records of fuel usage and steel throughput at the Reheat Furnace will be maintained on site for a period of five years.

Setup and operation of the Reheat Furnace shall be in accordance with the normal operating parameters and rolling temperatures (approximate) as outlined in the QMS process control references for each specific grade of steel.

Maintenance and calibration of equipment, including temperature thermocouples and 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 QMS practices. The differential pressure transducers shall be checked in accordance with manufacturer's specifications and/or the QMS practices.

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



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.

An emissions test to determine compliance with the 0.15 lb/mmBTU NOx limitation shall be performed once during the term of the permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

Subsequent reports are due every 6 calendar month(s).

Condition 28: Compliance Certification
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement:6 NYCRR 216.5

Item 28.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU01

Emission Point: 63101

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A NOx RACT compliance plan addressing the combustion of natural gas for the Reheat Furnace was received by the department on June 2, 2008. This NOx RACT compliance plan must be updated and submitted to the Department with the permit renewal application.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 29: Compliance Certification
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement:6 NYCRR 216.5

Item 29.1:

The Compliance Certification activity will be performed for:



Emission Unit: 0-0EU01

Emission Point: 63101

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The NOx emission limit for the Reheat Furnace is 0.15 lbs/mmBtu.

Republic shall perform a NOx emission test on the Reheat Furnace once during the permit term. The emissions test shall be performed at least 180 days prior to expiration of this permit.

Republic shall:

(1) submit a compliance test protocol to the department for approval at least 30 days prior to emission testing.

The conditions of the testing and the locations of the sampling devices must be acceptable to the department; and

(2) utilize the following procedures set forth in 40 CFR part 60, Appendix A or any other method acceptable to the department and the administrator for determining compliance with the appropriate NOx limit and must, in addition, follow the procedures set forth in Part 202 of this Title:

(i) utilize Method 7, 7E, or 19 from 40 CFR part 60, Appendix A or another reference method approved by the department;

(3) submit a compliance test report containing the results of the emission test to the department no later than 60 days after completion of the emission test.

All reports and records must be maintained for a period of five years.

Upper Permit Limit: 0.15 pounds per million Btus

Reference Test Method: EPA METHODS 7-7E

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2013.

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



boilers including any necessary calibration activities.

The Department reserves the right to have Republic perform an EPA Method 9 test at any time.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Certification
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable Federal Requirement: 6 NYCRR 227-2.6 (c)

Item 32.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The NOx emission limit for large boilers is 0.20 lbs/mmBtu prior to July 1, 2014.

Republic shall perform a NOx emission test on one of the boilers once during this permit's term. Republic shall perform a NOx emission test on the other boiler once during the next permit term. The emissions test shall be performed at least 180 days prior to expiration of this permit.

Republic shall:

(1) submit a compliance test protocol to the department for approval



at least 30 days prior to emission testing. The conditions of the testing and the locations of the sampling devices must be acceptable to the department; and

(2) utilize the following procedures set forth in 40 CFR part 60,

Appendix A or any other method acceptable to the department and the administrator for determining compliance with the appropriate NOx limit in section 227-2.4 of this Subpart, and must, in addition, follow the procedures set forth in Part 202 of this Title:

(i) for large and mid-size boilers, utilize Method 7, 7E, or 19 from 40 CFR part 60, Appendix A or another reference method approved by the department;

(3) submit a compliance test report containing the results of the emission test to the department no later than 60 days after completion of the emission test.

All reports and records must be maintained for a period of five years.

Upper Permit Limit: 0.20 pounds per million Btus
Reference Test Method: EPA Methods 7-7E
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.
Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Certification
Effective between the dates of 07/01/2014 and 09/30/2017

Applicable Federal Requirement: 6 NYCRR 227-2.6 (c)

Item 33.1:

The Compliance Certification activity will be performed for:

Emission Unit: 0-0EU02



Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The NOx emission limit for large boilers on or after July 1, 2014 is 0.06 lbs/mmBtu.

Republic shall perform a NOx emission test on one of the boilers once during this permit's term. Republic shall perform a NOx emission test on the other boiler once during the next permit term. The emissions test shall be performed at least 180 days prior to expiration of this permit.

Republic shall:

- (1) submit a compliance test protocol to the department for approval at least 30 days prior to emission testing. The conditions of the testing and the locations of the sampling devices must be acceptable to the department; and
- (2) utilize the following procedures set forth in 40 CFR part 60, Appendix A or any other method acceptable to the department and the administrator for determining compliance with the appropriate NOx limit in section 227-2.4 of this Subpart, and must, in addition, follow the procedures set forth in Part 202 of this Title:
 - (i) for large and mid-size boilers, utilize Method 7, 7E, or 19 from 40 CFR part 60, Appendix A or another reference method approved by the department;
 - (3) submit a compliance test report containing the results of the emission test to the department no later than 60 days after completion of the emission test.

All reports and records must be maintained for a period of five years.

Upper Permit Limit: 0.06 pounds per million Btus
Reference Test Method: EPA METHODS 7-7E
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2013.



Subsequent reports are due every 6 calendar month(s).



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

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.

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.

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 34: Contaminant List
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable State Requirement:ECL 19-0301

Item 34.1:
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: 0NY210-00-0

Name: OXIDES OF NITROGEN

**Condition 35: Unavoidable noncompliance and violations
Effective between the dates of 10/01/2012 and 09/30/2017**

Applicable State Requirement: 6 NYCRR 201-1.4

Item 35.1:

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 issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. 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. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(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.



(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

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

Condition 36: Compliance Demonstration
Effective between the dates of 10/01/2012 and 09/30/2017

Applicable State Requirement: 6 NYCRR 227-2.4 (d)

Item 36.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0EU05

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 36.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Republic Engineered Products Inc has contracted with Bulldog Boilers for a package boiler to supply additional heat during the winter months. The package boiler is rated at 32 mmBtu/hr and burns natural gas only. Due to ducting constraints, the boiler cannot exceed 20 mmBtu/hr.

Republic Engineered Products Inc has accepted a 20 mmBtu/hr limit for the package boiler. Therefore, the boiler is subject to the small boiler rules according to 6 NYCRR Part 227-2.4(d):

The owner or operator of a small boiler must annually perform a tune-up and maintain, in a permanently bound log book, or other format approved in writing by the department, the following information:

- (1) the date of the last tune-up;
- (2) the name, title and affiliation of the person who made the adjustments; and
- (3) any other information that the department may require.

However, the boiler has an Autoflame Data System installed

New York State Department of Environmental Conservation

Permit ID: 9-1448-00178/00009

Facility DEC ID: 9144800178



where an Exhaust Gas Analyzer looks at data ever 30 seconds and tunes the burner to a continual optimization. Due to this fact, there is no need to perform an annual tune-up or record the name, title and affiliation of the person who made the adjustments. Also, there is a flow meter that records the amount of gas used every second. The owner shall submit to the Department semiannually the gas usage, in a format acceptable to the Department, to prove that the boiler did not exceed 20 mmBtu/hr.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: NATURAL GAS

Upper Permit Limit: 20 million Btu per hour

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

