

New York State Department of Environmental Conservation
Facility DEC ID: 9144800272



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 9-1448-00272/00012
Effective Date: 06/06/2001 Expiration Date: 06/06/2006

Permit Issued To: BETHLEHEM STEEL CORP
1170 EIGHTH AVENUE
BETHLEHEM, PA 18016

Contact: KENNETH M HORTON
BETHLEHEM STEEL CORPORATION, GALVANIZED PRODUCTS
3175 LAKESHORE ROAD
BUFFALO, NY 14219
(716) 821-3514

Facility: BETHLEHEM STEEL - GALVANIZED PRODUCTS
3175 LAKESHORE RD
BLASDELL, NY 14219

Description:

The Bethlehem Steel Corporation - Galvanized Products Division, Lackawanna Plant produces galvanized steel coils to customer specifications from plain steel coils shipped to the site from other Bethlehem Steel facilities. The plant consists of five major process areas: pickling, cold reduction, batch anneal, temper rolling and hot dip galvanizing. In addition, side trimming, slitting, cut-to-length, and oiling operations are performed in the Finishing and Shipping Areas. The plant requires a Title V facility permit because potential emissions of particulates, total hazardous air pollutants, and hydrochloric acid exceed the major facility thresholds of 100, 25, and 10 tons per year respectively. However, the only contaminant whose actual annual emissions are typically above the major source threshold is hydrochloric acid.

This Title V facility permit contains six emission units and their associated regulatory requirements. These are as follows:

Emission Unit 2-00001 - #3 Pickle Line:

The #3 Pickle Line removes surface scale and oxides from the steel strip. The continuous processing line consists of four processes: 1) welding, 2) tempering/descaling, 3) pickling, and 4) slitting & oiling. The pickling process uses hydrochloric acid dip tanks to clean and remove scale from the steel strip and is controlled by a wet scrubber which vents through a stack. The spent pickle liquor pit is vented through an opening in the top of the pit. The building roof monitor serves as an emission point for the remaining processes. This unit is located in the Cold Mill building. There are also two HCl storage tanks located in the Cold Mill building associated with this unit.

The #3 Pickle Line is subject to 40CFR63 Subpart CCC - National Emission Standard for Hazardous Air



New York State Department of Environmental Conservation
Facility DEC ID: 9144800272

Pollutants (NESHAP) for Steel Pickling. The plant must achieve initial compliance with this regulation by June 22, 2001. Under this regulation, the facility is required to:

- conduct performance tests by December 22, 2001 to determine compliance with a hydrogen chloride emission limit of 18 parts per million (by volume) or a hydrogen chloride emission reduction of at least 97 percent by weight;
- install, operate, and maintain systems for the measurement and recording of the pickling line's wet scrubber makeup water flow rate;
- semi-annual inspection of the hydrochloric acid storage vessel to determine that the air pollution control device is properly operating.

Until the compliance date of the NESHAP, the plant must continue to operate under the requirements of the current New York State regulations.

Emission Unit 2-00002 - Rolling Mills:

The four processes which make up this unit are reduction rolling, temper rolling/oiling, slitting/oiling, and packaging/oiling. The only emission point for this unit is the Tandem Mill roof monitor which vents these four processes. These processes are located in the Cold Mill building. Reduction rolling reduces steel strip gauge while temper rolling restores the proper degree of hardness, improves the strip flatness and imparts the desired surface finish to the strip. Before shipping, the strip can be slit to a customer's desired width and roll coated with a protective oil.

Emissions from this emission unit are regulated by the general process emission regulation for opacity of emissions from the roof monitor.

Emission Unit 2-00004 - Roll Shops and Maintenance:

The roll shops and maintenance unit consists of the process of roll grinding, where pickle line, galvanized line, tandem mill, and temper mill rolls are ground to improve the roll surface. The roll grinders are located in the Cold Mill building and have no emission point. This emission unit also contains two shot blasters that are trivial sources.

Emissions from this emission unit are insignificant and as such there are no air pollution control requirements contained in the Title V permit.

Emission Unit 2-00005 - Hot Dip Galvanizing Line:

The hot dip galvanize line cleans the steel strip before coating it with molten zinc and drying or annealing the strip. The continuous process line consists of 10 processes: 1) welding, 2) cleaning/pickling, 3) drying/preheating, 4) galvanizing, 5) annealing, 6) quenching/rinsing, 7) chemical treating, 8) printing, 9) oiling, and 10) slitting/oiling. The cleaning/pickling section vents to a demister and subsequently a stack. The zinc coating pot vents to a fume scrubber and out a stack. The drying/preheating oven, annealing oven, and chemical treatment process exhaust through separate stacks. Emissions from the remaining processes vent through the Galvanize Building roof monitor. This unit is located in the Galvanize Building.

Emissions from the galvanizing coating pot section of the Hot Dip Galvanizing Line are controlled by a



New York State Department of Environmental Conservation
Facility DEC ID: 9144800272

wet scrubber. An alternate opacity limit of 50 percent proposed by the permittee per 6 NYCRR Part 212.6(b) was approved by the Department in this permit. The alternate opacity standard was approved because Bethlehem proved through emission testing that at 50 percent opacity, the stack meets the particulate emission limit of 0.05 grains of particulate per dry standard cubic foot of exhaust gas. Compliance monitoring conditions are included in this permit for periodic opacity monitoring and continuous operation of the flux wiping fan. In addition, the wet scrubber must maintain a water flow rate of at least 200 gallons per minute and a pressure drop of at least 24 inches of water.

Emission Unit 2-00007:

Water Quality Control Station No. 7 treats acidic and oily wastewater before it is discharged into Smokes Creek. The three processes are chemical reaction, filtration, and holding. Filtration, and holding in Reactor A are in the Water Quality Control and related buildings while Reactor B is outside near these buildings. Emissions vent through the building's roof monitors, except Reactor B which has fugitive emissions. This emission unit also contains lime silos which are equipped with a baghouse and are thus exempt sources.

Emissions from this emission unit are insignificant and as such there are no air pollution control requirements contained in the Title V permit.

Facility Level:

The Title V permit contains the mandatory compliance conditions that are included with all Title V permits. In addition, all necessary reporting and recordkeeping requirements are included to allow the Department to determine the compliance status of the facility.

The Title V permit application submitted by Bethlehem lists several exempt and trivial sources. These sources while exempt from permitting, must still comply with any other applicable regulatory requirements and Bethlehem must maintain information on site proving that these sources continue to meet the permit exemption requirements.

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 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 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 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 and Modifications

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 ******

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 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

New York State Department of Environmental Conservation
Facility DEC ID: 9144800272



Item 4.1:

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 5: Submission of Applications for Permit Modification or Renewal -REGION 9 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(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 14203-2999
(716) 851-7165



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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BUFFALO, NY 14219
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Facility: BETHLEHEM STEEL - GALVANIZED PRODUCTS
3175 LAKESHORE RD
BLASDELL, NY 14219

Authorized Activity By Standard Industrial Classification Code:
3316 - COLD FINISHING OF STEEL SHAPES

Permit Effective Date: 06/06/2001

Permit Expiration Date: 06/06/2006



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
- 25 Compliance Certification
- 27 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 Prohibitions
- 34 Operation and Maintenance Requirements
- 35 Startup, Shutdown and Malfunction
- 36 Monitoring Requirements
- 37 40 CFR 63.9 (b)(1),(2) Initial Notification Requirement
- 38 § 63.10(b) General Recordkeeping Requirements
- 39 §63.10(d) General Reporting Requirements
- 40 Recycling and Emissions Reduction

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



Emission Unit Level

- 41 Emission Point Definition By Emission Unit
- 42 Process Definition By Emission Unit
- 43 Applicability statement - including Subpart A General Provisions
- 44 Operational and equipment standards for hydrochloric acid storage vessels
- 45 Compliance dates for existing steel pickling facilities
- 46 Maintenance requirements
- 47 Compliance Certification (EU=2-00001)
- 48 Compliance Certification (EU=2-00001)
- 49 Establishment of scrubber operating parameters
- 50 Compliance Certification (EU=2-00001)
- 51 Compliance Certification (EU=2-00001)
- 52 Request for extension of compliance
- 53 Compliance Certification (EU=2-00001)
- 54 Compliance Certification (EU=2-00001,Proc=130)
- 55 Compliance Certification (EU=2-00001,Proc=130)
- 56 Emissions from existing sources
- 57 Compliance Certification (EU=2-00002)
- 58 Compliance Certification (EU=2-00005,Proc=270)
- 59 Compliance Certification (EU=2-00005,Proc=270)
- 60 Compliance Certification (EU=2-00005,Proc=270)
- 61 Compliance Certification (EU=2-00005,Proc=270)
- 62 Compliance Certification (EU=2-00005,EP=68301,Proc=250)
- 63 Compliance Certification (EU=2-00005,EP=68301,Proc=270)
- 64 Compliance Certification (EU=2-00005,EP=68304,Proc=260)

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 65 General Provisions
- 66 Contaminant List
- 67 Air pollution prohibited



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

FEDERALLY ENFORCEABLE CONDITIONS

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

Condition 1: Sealing

Effective between the dates of 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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: 9-1448-00272/00012

Facility DEC ID: 9144800272

Condition 4: Unpermitted Emission Sources
Effective between the dates of 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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: 9-1448-00272/00012

Facility DEC ID: 9144800272

(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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 201-1.7



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

201 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 12: Applicable Criteria, Limits, Terms, Conditions and Standards
Effective between the dates of 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 201-6.



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

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:b Federally-Enforceable Requirements

Effective between the dates of 06/06/2001 and 06/06/2006

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



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

only state regulations.

Condition 16: Fees

Effective between the dates of 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 201-6.

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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.



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

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.

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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 23.1:



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

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.

Condition 24: Emission Unit Definition

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 201-6.

Item 24.1:

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

Emission Unit: 2-00001

Emission Unit Description:

The #3 Pickle Line removes surface scale and oxides from the steel strip. The continuous processing line consists of four processes: 1) welding, 2) tempering/descaling, 3) pickling, and 4) slitting & oiling. The pickling process, controlled by a wet scrubber, vents through a stack. The spent pickle liquor pit is vented through an opening in the top of the pit. The building roof monitor serves as an emission point for the remaining processes. This unit is located in the Cold Mill building. There are also two HCl storage tanks located in the Cold Mill building associated with this unit.

Building(s): 412

Item 24.2:

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

Emission Unit: 2-00002

Emission Unit Description:

Reduction rolling reduces steel strip gauge while temper rolling restores the proper degree of hardness, improves the strip flatness and imparts the desired surface finish to the strip. Before shipping, the strip can be slit to a customer's desired width and roll coated with a protective oil. The four processes which make up this unit are reduction rolling, temper rolling/oiling, slitting/oiling, and packaging/oiling. The only emission point for this unit is the Tandem Mill roof monitor which vents these four processes. These processes are located in the Cold Mill building.

Building(s): 412

Item 24.3:

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

Emission Unit: 2-00004

Emission Unit Description:



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

The roll shops and maintenance unit consists of the process of roll grinding, where pickle line, galvanized line, tandem mill, and temper mill rolls are ground to improve the roll surface. The roll grinders are located in the Cold Mill building and have no emission point. This emission unit also contains two shot blasters that are trivial sources.

Building(s): 412

Item 24.4:

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

Emission Unit: 2-00005

Emission Unit Description:

The hot dip galvanize line cleans the steel strip before coating it with molten zinc and drying or annealing the strip. The continuous process line consists of 10 processes: 1) welding, 2) cleaning/pickling, 3) drying/preheating, 4) galvanizing, 5) annealing, 6) quenching/rinsing, 7) chemical treating, 8) printing, 9) oiling, and 10) slitting/oiling. The cleaning/pickling section vents to a fume scrubber and subsequently a stack. The zinc coating pot also vents to a fume scrubber and out a stack. The drying/preheating oven, annealing oven, and chemical treatment process exhaust through separate stacks. Emissions from the remaining processes vent through the Galvanize Building roof monitor. This unit is located in the Galvanize Building.

Building(s): 757

Item 24.5:

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

Emission Unit: 2-00007

Emission Unit Description:

Water Quality Control Station No. 7 treats acidic and oily wastewater before it is discharged into Smokes Creek. The three processes are chemical reaction, filtration, and holding. Filtration, and holding in Reactor A are in the Water Quality Control and related buildings while Reactor B is outside near these buildings. Emissions vent through the building's roof monitors, except Reactor B which has fugitive emissions. This emission unit also contains lime silos which are equipped with a baghouse and are thus exempt sources.

Building(s): 2005



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

Condition 26: Compliance Certification

Effective between the dates of 06/06/2001 and 06/06/2006

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:

rd

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 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



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

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)
Reports due 30 days after the reporting period.
The initial report is due 10/30/01.
Subsequent reports are due every 6 calendar month(s).

Condition 25: Compliance Certification
Effective between the dates of 06/06/2001 and 06/06/2006

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

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Item 25.2:

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 Department.



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

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
625 Broadway
Albany, NY 12233-3258

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/02.
Subsequent reports are due on the same day each year

Condition 27: Permit Exclusion Provisions
Effective between the dates of 06/06/2001 and 06/06/2006

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

Item 27.1:

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: 9-1448-00272/00012

Facility DEC ID: 9144800272

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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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: 9-1448-00272/00012

Facility DEC ID: 9144800272

Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 30: Recordkeeping requirements
Effective between the dates of 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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 06/06/2001 and 06/06/2006

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: Prohibitions
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.4, Subpart A

Item 33.1:

The facility is required to comply with Part 63 requirements regardless of whether those requirements have been included in a Title V (6NYCRR part 201-6) permit for the source.



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

Intentional or unintentional concealment of an emission that would otherwise violate a standard is itself a violation.

Condition 34: Operation and Maintenance Requirements
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.6(e)(1)(i), Subpart A

Item 34.1:

At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan required in §63.6(e)(3). Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.

Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan required in §63.6(e)(3)), review of operation and maintenance records, and inspection of the source.

Condition 35: Startup, Shutdown and Malfunction
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.6(e)(3), Subpart A

Item 35.1:

The owner or operator of an applicable source shall develop and implement a written startup, shutdown and malfunction (SSM) plan that describes in detail procedures for operating and maintaining the source during periods of SSM and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. Consult 40 CFR 63.6(e)(3) (i through viii) for specific requirements regarding SSM plans.

Condition 36: Monitoring Requirements
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.8, Subpart A

Item 36.1:

Sources requiring continuous emission monitors.

40 CFR 63.8 The owner or operator of an affected source shall conduct a performance evaluation of a required continuous emission monitor during any performance test required under §63.7 in accordance with the applicable performance specification as specified in the relevant standard. The owner or operator must submit a site-specific performance evaluation test plan as described in 63.8(e)(3).

Condition 37: 40 CFR 63.9 (b)(1),(2) Initial Notification Requirement
Effective between the dates of 06/06/2001 and 06/06/2006

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



Applicable Federal Requirement: 40CFR 63.9, Subpart A

Item 37.1:

120 days after the effective date of the applicable NESHAP, the source must notify the Department of its compliance status and include a brief description of the nature, size, and design and method of operation of the source as described in 40 CFR 63.9 (b)(1) and (2).

Condition 38: § 63.10(b) General Recordkeeping Requirements
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 38.1:

The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. At a minimum the most recent 2 years of data shall be retained on site. The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records for such source as described in 40 CFR 63.10 (b)(2).

Condition 39: §63.10(d) General Reporting Requirements
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 39.1:

The owner or operator of an affected source subject to the reporting requirements under the general provisions shall submit reports to the Department in accordance with the reporting requirements in the relevant standards as described in 40 CFR 63.10 (d).

Condition 40: Recycling and Emissions Reduction
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 40.1:

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:

- 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



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

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 41: Emission Point Definition By Emission Unit
Effective between the dates of 06/06/2001 and 06/06/2006**

Applicable Federal Requirement: 6NYCRR 201-6.

Item 41.1:

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

Emission Unit: 2-00001

Emission Point: 52203

Height (ft.): 84 Diameter (in.): 48
NYTMN (km.): 4747.22 NYTME (km.): 185.029 Building: 412

Item 41.2:

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

Emission Unit: 2-00005

Emission Point: 68301

Height (ft.): 81 Diameter (in.): 42
NYTMN (km.): 4747.22 NYTME (km.): 185.029 Building: 757

Emission Point: 68303

Height (ft.): 194 Diameter (in.): 72
NYTMN (km.): 4747.22 NYTME (km.): 185.029 Building: 757

Emission Point: 68304

Height (ft.): 133 Diameter (in.): 50
NYTMN (km.): 4747.22 NYTME (km.): 185.029 Building: 757

**Condition 42: Process Definition By Emission Unit
Effective between the dates of 06/06/2001 and 06/06/2006**

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



Applicable Federal Requirement: 6NYCRR 201-6.

Item 42.1:

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

Emission Unit: 2-00001

Process: 110

Source Classification Code: 3-09-005-00

Process Description:

#3 Pickle Line-Welding - A flash butt welder is located at the entry end of the pickle line. It connects the tail end of one steel strip to the head end of the next strip so that the pickle line can operate continuously. This process has insignificant emissions.

Emission Source/Control: 77020 - Process

Item 42.2:

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

Emission Unit: 2-00001

Process: 120

Source Classification Code: 3-04-007-15

Process Description:

#3 Pickle Line-Tempering/descaling - This roll stand follows the welding process on the pickle line. Its primary function is to maintain tension in the strip as it continues through the pickle line. This process has insignificant emissions.

Emission Source/Control: 77030 - Process

Item 42.3:

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

Emission Unit: 2-00001

Process: 130

Source Classification Code: 3-03-009-10

Process Description:

#3 Pickle Line-Pickling - Pickling removes surface scale and oxides from the steel strip that were formed in the hot rolling operation. The strip is passed through four tanks containing a hydrochloric acid solution of various concentrations followed by a rinse tank, and dryer. The emissions are controlled by a wet scrubber.

Emission Source/Control: 78290 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 77010 - Process

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



Emission Source/Control: 77040 - Process

Emission Source/Control: 77060 - Process

Emission Source/Control: 78340 - Process

Item 42.4:

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

Emission Unit: 2-00001

Process: 140

Source Classification Code: 3-04-007-15

Process Description:

#3 Pickle Line-Oiling - A protective coating of oil is applied to the steel strip before it is coiled. This process has insignificant emissions.

Emission Source/Control: 77050 - Process

Item 42.5:

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

Emission Unit: 2-00002

Process: 160

Source Classification Code: 3-03-009-35

Process Description:

Reduction Rolling - The 75" 4-high tandem mill uses four in-line stands to gradually reduce the gauge of the steel strip depending on the product thickness ordered by the customer. A rolling solution is applied to the steel strip to facilitate rolling.

Emission Source/Control: 77070 - Process

Emission Source/Control: 77080 - Process

Item 42.6:

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

Emission Unit: 2-00002

Process: 170

Source Classification Code: 3-03-009-35

Process Description:

Temper Rolling/Oiling - After heat treating, the steel is rolled on the 4-high single stand Number 6 skin mill. This rolling performs three functions: 1) restores proper degree of hardness, 2) improves the strip flatness, and 3) imparts the desired surface finish to the strip.

Emission Source/Control: 77120 - Process

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



Item 42.7:

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

Emission Unit: 2-00002

Process: 180

Source Classification Code: 3-04-007-15

Process Description:

Slitting/Oiling - Before shipping, coils can be slit to customers requirements on either the #4 or 5 Stamco Slitter & Oiler. This process has insignificant emissions.

Emission Source/Control: 77150 - Process

Emission Source/Control: 77160 - Process

Item 42.8:

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

Emission Unit: 2-00002

Process: 190

Source Classification Code: 3-04-007-15

Process Description:

Packaging/Oiling - Coils can be oiled and packaged on either #1 or 2 Packaging Line before shipment. This process has insignificant emissions.

Emission Source/Control: 77130 - Process

Emission Source/Control: 77140 - Process

Item 42.9:

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

Emission Unit: 2-00004

Process: 220

Source Classification Code: 3-04-007-15

Process Description:

Roll Grinding - Work roll and backup roll grinders are used to impart a new surface finish on the roll. Generally, the grinding interface is continuously flooded with an aqueous cutting coolant. This process has insignificant emissions.

Emission Source/Control: 77180 - Process

Item 42.10:

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

Emission Unit: 2-00005



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

Process: 240

Source Classification Code: 3-09-005-00

Process Description:

Hot Dip Galvanize Line-Welding - A lap welder is located at the entry end of the galvanize line. It connects the tail end of one steel strip to the head end of the next strip so that the galvanize line can operate continuously. This process has insignificant emissions.

Emission Source/Control: 78360 - Process

Item 42.11:

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

Emission Unit: 2-00005

Process: 250

Source Classification Code: 3-03-009-10

Process Description:

Hot Dip Galvanize Line-Cleaning - Surface scale and iron oxides are removed as the strip passes through three alkali tanks, one acid pickling tank, and one flux tank. The emissions are controlled by a wet scrubber.

Emission Source/Control: 78320 - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: 77280 - Process

Item 42.12:

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

Emission Unit: 2-00005

Process: 260

Source Classification Code: 3-03-015-80

Process Description:

Hot Dip Galvanize Line-Drying/Preheating - After the cleaning section, the strip passes through a natural gas-fired drying and preheating furnace.

Emission Source/Control: 77290 - Process

Item 42.13:

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

Emission Unit: 2-00005

Process: 270

Source Classification Code: 3-03-009-36

Process Description:

Hot Dip Galvanize Line-Galvanizing - The strip enters the zinc coating pot and emerges from the molten zinc bath with a coating of liquid zinc. Nitrogen is then blown through nozzles against the zinc surface to reduce the

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



zinc thickness to the desired level. Emissions are controlled by a wet scrubber.

Emission Source/Control: 78330 - Control
Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 77300 - Process

Emission Source/Control: 77310 - Process

Item 42.14:

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

Emission Unit: 2-00005
Process: 280
Source Classification Code: 3-03-009-34
Process Description:
Hot Dip Galvanize Line-Annealing - After being coated with zinc, the strip can be annealed in a natural gas-fired continuous annealing furnace.

Emission Source/Control: 77320 - Process

Item 42.15:

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

Emission Unit: 2-00005
Process: 290
Source Classification Code: 3-04-022-11
Process Description:
Hot Dip Galvanize Line-Quenching/Rinsing - Following the annealing section, the strip can pass through a water rinse tank. This also quenches the strip to cool it before being further processed or coiled. This process has insignificant emissions.

Emission Source/Control: 77330 - Process

Item 42.16:

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

Emission Unit: 2-00005
Process: 300
Source Classification Code: 3-03-009-36
Process Description:
Hot Dip Galvanize Line-Chemical Treating - A phosphate or chromate coating is applied to protect the strip's surface. The coating dries as it passes through an electric, infrared oven, and/or one of two natural gas-fired dryers.



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

Emission Source/Control: 77340 - Process

Item 42.17:

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

Emission Unit: 2-00005

Process: 320

Source Classification Code: 3-04-007-15

Process Description:

Hot Dip Galvanize Line-Oiling - Oil is applied as a protective coating to the strip before it is coiled. This process has insignificant emissions.

Emission Source/Control: 77360 - Process

Item 42.18:

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

Emission Unit: 2-00005

Process: 370

Source Classification Code: 3-04-007-15

Process Description:

Hot Dip Galvanize Line-Slitting/Oiling - Before shipping, coils can be slit to customers requirements on either the Wean or Aetna Slitter & Oiler. An oiler applies a protective coating to the strip. This process has insignificant emissions.

Emission Source/Control: 77380 - Process

Emission Source/Control: 77390 - Process

Item 42.19:

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

Emission Unit: 2-00007

Process: 340

Source Classification Code: 5-03-007-02

Process Description:

n0 Chemical Reaction - Acidic wastewater is sent to reactor B where it is mixed with a lime slurry to adjust pH. From the reactor it goes to the thickener where it is combined with the oily waste water stream. Oily wastewater is filtered and sent to the thickener. The back wash from the oily water filters is sent to an oil skimming step where waste oil is recovered. This process has insignificant emissions.

Emission Source/Control: 77470 - Process

Emission Source/Control: 78170 - Process

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



Item 42.20:

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

Emission Unit: 2-00007

Process: 350

Source Classification Code: 5-03-008-99

Process Description:

Filtration - The thickener overflow discharges to a filter system before being discharged to Smokes Creek. This process has insignificant emissions.

Emission Source/Control: 78180 - Process

Emission Source/Control: 78190 - Process

Item 42.21:

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

Emission Unit: 2-00007

Process: 360

Source Classification Code: 5-03-008-99

Process Description:

Holding - Various waste streams are held for further processing or shipment in the following areas: scale pit, galvanize mill waste pit, and spent pickle liquor tank. This also includes spent pickle liquor loadout. This process has insignificant emissions.

Emission Source/Control: 77250 - Process

Emission Source/Control: 77670 - Process

Emission Source/Control: 77680 - Process

Condition 43: Applicability statement - including Subpart A General Provisions

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.1155, Subpart CCC

Item 43.1:

This Condition applies to Emission Unit: 2-00001

Item 43.2:

Owners or operators of affected sources subject to 40CFR63 Subpart CCC must also comply with the requirements of 40CFR63 Subpart A, according to the applicability of Subpart A to such sources, as identified in Table 1 of Subpart CCC. Subpart A is the General Provisions for the NESHAP for Source Categories regulations. The General Provisions contain requirements for performance testing, monitoring, notification, record keeping, reporting, and control devices that may apply to the source.

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



Condition 44: Operational and equipment standards for hydrochloric acid storage vessels
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.1159, Subpart CCC

Item 44.1:

This Condition applies to Emission Unit: 2-00001

Item 44.2:

The owner or operator of an affected vessel shall provide and operate, except during loading and unloading of acid, a closed-vent system for each vessel. Loading and unloading shall be conducted either through enclosed lines or each point where the acid is exposed to the atmosphere shall be equipped with a local fume capture system, ventilated through an air pollution control device.

Condition 45: Compliance dates for existing steel pickling facilities
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.1160(a), Subpart CCC

Item 45.1:

This Condition applies to Emission Unit: 2-00001

Item 45.2:

The owner or operator of an affected existing pickling facility subject to 40CFR63 Subpart CCC shall achieve initial compliance with the requirements of Subpart CCC no later than June 22, 2001.

Condition 46: Maintenance requirements
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.1160(b), Subpart CCC

Item 46.1:

This Condition applies to Emission Unit: 2-00001

Item 46.2:

The owner or operator of an affected source shall comply with the operation and maintenance requirements prescribed under §63.6(e) of subpart A of this part. Additionally, the owner or operator shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's title V permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

- (i) Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
- (ii) Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

- (iii) Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;
- (iv) Require an inspection of each scrubber at intervals of no less than 3 months with:
 - (A) Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
 - (B) Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
 - (C) Repair or replacement of droplet eliminator elements as needed;
 - (D) Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
 - (E) Adjustment of damper settings for consistency with the required air flow.
- (v) If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Administrator may be used.
- (vi) The owner or operator shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of this subpart.
- (vii) The owner or operator shall maintain a record of each inspection, including each item identified in paragraph (b)(2)(iv) of this section, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

Condition 47: Compliance Certification
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.1161(a), Subpart CCC

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator will conduct an initial performance test no later than December 22, 2001, for each process or emission control device to determine and demonstrate compliance with either the applicable collection efficiency standard or the applicable emission concentration standard according to the requirements in Section 63.7 of Subpart A and in Section 63.1161(a)(1) - (3) & (d) of Subpart CCC. Subsequent performance tests

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



will be conducted annually (or according to an alternative schedule that is approved by the Regional Air Pollution Control Engineer, but no less frequently than every 2 1/2 years or twice per Title V permit term) within the same calendar year quarter as the initial performance test. A performance test sampling protocol which meets the requirements of Section 63.7(c) of Subpart A will be submitted to the Regional Air Pollution Control Engineer at least 60 days prior to sampling for Department review and approval. As required by Sec. 63.9(e) of subpart A of this part, the owner or operator of an affected source will notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow the Administrator to review and approve the site-specific test plan required under Sec. 63.7(c) of subpart A of this part and, if requested by the Administrator, to have an observer present during the test.

Parameter Monitored: HYDROGEN CHLORIDE

Upper Permit Limit: 18 parts per million (by volume)

Reference Test Method: EPA Method 26A

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 48: Compliance Certification

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.1161(a), Subpart CCC

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator will conduct an initial performance



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

test no later than December 22, 2001, for each process or emission control device to determine and demonstrate compliance with either the applicable collection efficiency standard or the applicable emission concentration standard according to the requirements in Section 63.7 of Subpart A and in Section 63.1161(a)(1) - (3) & (d) of Subpart CCC. CCC. Subsequent performance tests will be conducted annually (or according to an alternative schedule that is approved by the Regional Air Pollution Control Engineer, but no less frequently than every 2 1/2 years or twice per Title V permit term) within the same calendar year quarter as the initial performance test. A performance test sampling protocol which meets the requirements of Section 63.7(c) of Subpart A will be submitted to the Regional Air Pollution Control Engineer at least 60 days prior to sampling for Department review and approval. As required by Sec. 63.9(e) of subpart A of this part, the owner or operator of an affected source will notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow the Administrator to review and approve the site-specific test plan required under Sec. 63.7(c) of subpart A of this part and, if requested by the Administrator, to have an observer present during the test.

Parameter Monitored: HYDROGEN CHLORIDE

Lower Permit Limit: 97 percent reduction by weight

Reference Test Method: EPA Method 26A

Monitoring Frequency: AS REQUIRED - SEE MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 49: Establishment of scrubber operating parameters
Effective between the dates of 06/06/2001 and 06/06/2006**

Applicable Federal Requirement: 40CFR 63.1161(b), Subpart CCC

Item 49.1:

This Condition applies to Emission Unit: 2-00001

Item 49.2:

During the performance test for each emission control device, the owner or operator using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

makeup water flow rate and, for scrubbers that operate with recirculation, the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The owner or operator shall determine the operating parameter monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per Section 63.1161(a)(2) of Subpart CCC. An owner or operator may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, an owner or operator may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

Condition 50: Compliance Certification
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.1162(a)(2), Subpart CCC

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator will install, operate, and maintain systems for the measurement and recording of the scrubber makeup water flow rate. This flow rate must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate less than the minimum value established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in §63.1160(b)(2) of this subpart. Failure to record the scrubber makeup water flow rate is a violation of the monitoring requirements of this subpart.

Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

The owner or operator may develop and implement alternative monitoring requirements subject to approval by the Administrator.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 51: Compliance Certification

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.1162(c), Subpart CCC

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of the affected hydrochloric acid storage vessel will inspect each vessel semiannually to determine that the closed- vent system and either the air pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.

Monitoring Frequency: SEMI-ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 52: Request for extension of compliance

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.1163(b), Subpart CCC

Item 52.1:

This Condition applies to Emission Unit: 2-00001

Item 52.2:

As required by §63.9(c) of subpart A of this part, if the owner or operator of an affected source cannot comply with this standard by the applicable compliance date for that source, or if the owner or operator has installed BACT or technology to meet LAER consistent with §63.6(i)(5) of subpart A of this part, he/she may submit to the Regional Air Pollution Control Engineer a request for an extension of



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

compliance as specified in §63.6(i)(4) through 63.6(i)(6) of subpart A of this part.

Condition 53: Compliance Certification

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 40CFR 63.1165, Subpart CCC

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

Item 53.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

(a) General record keeping requirements: As required by §63.10(b)(2) of subpart A of this part, the owner or operator shall maintain records for 5 years from the date of each record of:

- (1) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment) as defined in the facility's startup, shutdown, & malfunction plan (SSMP);
- (2) The occurrence and duration of each malfunction of the air pollution control equipment;
- (3) All maintenance performed on the air pollution control equipment per the operation and maintenance plan required by §63.1160(b) of subpart CCC of this part;
- (4) Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
- (5) All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see §63.10(b)(2)(v) of subpart A of this part);
- (6) All required measurements needed to demonstrate compliance with the standard and to support data that the

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;

(7) All results of initial or subsequent performance tests;

(8) If the owner or operator has been granted a waiver from record keeping or reporting requirements under §63.10(f) of subpart A of this part, any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements;

(9) If the owner or operator has been granted a waiver from the initial performance test under §63.7(h) of subpart A of this part, a copy of the full request and the Administrator's approval or disapproval;

(10) All documentation supporting initial notifications and notifications of compliance status required by §63.9 of subpart A of this part; and

(11) Records of any applicability determination, including supporting analyses.

(b) Subpart CCC records:

(1) In addition to the general records required by paragraph (a) of this condition, the owner or operator shall maintain records for 5 years from the date of each record of:

(i) Scrubber makeup water flow rate;

(ii) Calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and

(iii) Each maintenance inspection and repair, replacement, or other corrective action.

(2) The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator or the Department for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Administrator or the Department for a period of 5 years after each revision to the plan.

(c) General records and subpart CCC records for the most



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

recent 2 years of operation must be maintained on site.
Records for the previous 3 years may be maintained off site.

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 54: Compliance Certification
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00001

Process: 130

Regulated Contaminant(s):

CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 54.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A computerized maintenance system will be used to keep the pickle line scrubber in optimum working order. This system will include regular inspection and maintenance on the scrubber's spray nozzles, pipes, shafts, belts, pulleys and fan bearings. After June 22, 2001, the facility will be considered to be in compliance with this condition if it is in compliance with 40CFR63 Subpart CCC.

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 55: Compliance Certification
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 55.1:

The Compliance Certification activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

Emission Unit: 2-00001

Process: 130

Item 55.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A performance test was completed confirming that this process complies with 6 NYCRR p. 212.6(a) when operating the control equipment. A computerized maintenance system will be used to keep the pickle line scrubber in optimum working order. Bethlehem shall observe the stack on a weekly basis and note in a log book whether or not any opacity was observed. If opacity is observed, the cause of the opacity shall immediately be identified and repaired or the process shall be shut down until repairs are completed. Each observation of opacity above zero percent and the associated repairs shall be noted in the log book. The Department reserves the right to require or conduct an EPA Method 9 opacity test.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 56: Emissions from existing sources
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 56.1:

This Condition applies to Emission Unit: 2-00001 Emission Point: 52203

Item 56.2:

No person will cause or allow emissions that violate the requirement specified in Table 2, Table 3, or Table 4 of 6NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 57: Compliance Certification
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 57.1:

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



The Compliance Certification activity will be performed for:

Emission Unit: 2-00002

Item 57.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Bethlehem shall observe the roof monitor on a weekly basis and note in a log book whether or not any opacity was observed. If opacity is observed, the cause of the opacity shall immediately be identified and repaired or the process shall be shut down until repairs are completed. Each observation of opacity above zero percent and the associated repairs shall be noted in the log book.

The Department reserves the right to require or conduct an EPA Method 9 opacity test.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 58: Compliance Certification

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 212.6(b)

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005

Process: 270

Item 58.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The flux wiping fan must continuously operate whenever the galvanizing process is operating. Records must be kept to verify that the fan was operated as necessary.

Monitoring Frequency: AS REQUIRED - SEE MONITORING



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/01.

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

Condition 59: Compliance Certification

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 212.6(b)

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005

Process: 270

Item 59.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This alternate opacity limit was proposed by Bethlehem Steel and approved by the Department in accordance with 6 NYCRR Part 212.6(b). Other requirements to assure continuous compliance with this opacity limit are included in this permit for continuous operation of the flux wiping fan during operation, scrubber water flow and pressure drop limits, and monthly opacity readings.

Parameter Monitored: OPACITY

Upper Permit Limit: 50 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: MONTHLY

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/01.

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

Condition 60: Compliance Certification

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 212.6(b)

Item 60.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



Emission Unit: 2-00005

Process: 270

Item 60.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The water flow rate through the wet scrubber will be continuously maintained at no less than 200 gallons per minute.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 200 gallons per minute

Monitoring Frequency: DAILY

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/01.

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

Condition 61: Compliance Certification

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 212.6(b)

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005

Process: 270

Item 61.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The pressure drop across the wet scrubber will be continuously maintained at no less than 24 inches of water.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 24 inches of water



New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272

Monitoring Frequency: DAILY
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
VALUE AT ANY TIME
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 10/30/01.
Subsequent reports are due every 6 calendar month(s).

Condition 62: Compliance Certification
Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 62.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005 Emission Point: 68301
Process: 250

Item 62.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A performance test was completed confirming that this process complies with 6 NYCRR p. 212.6(a) when operating the control equipment. A computerized maintenance system will be used to keep the cleaning/pickling scrubber in optimum working order. Bethlehem shall observe the stack on a weekly basis and note in a log book whether or not any opacity was observed. If opacity is observed, the cause of the opacity shall immediately be identified and repaired or the process shall be shut down until repairs are completed. Each observation of opacity above zero percent and the associated repairs shall be noted in the log book. The Department reserves the right to require or conduct an EPA Method 9 opacity test.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 63: Compliance Certification
Effective between the dates of 06/06/2001 and 06/06/2006

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 63.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005 Emission Point: 68301
Process: 270

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 63.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/02.

Subsequent reports are due every 12 calendar month(s).

Condition 64: Compliance Certification

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: 2-00005 Emission Point: 68304
Process: 260

Item 64.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



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

Monitoring Description:

This furnace will fire natural gas only to ensure compliance with this requirement. Bethlehem shall observe the stack on a weekly basis and note in a log book whether or not any opacity was observed. If opacity is observed, the cause of the opacity shall immediately be identified and repaired or the process shall be shut down until repairs are completed. Each observation of opacity above zero percent and the associated repairs shall be noted in the log book. The Department reserves the right to require or conduct an EPA Method 9 opacity test.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE MONITORING
DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



STATE ONLY ENFORCEABLE CONDITIONS

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

Condition 65: General Provisions

Effective between the dates of 06/06/2001 and 06/06/2006

Applicable State Requirement: 6NYCRR 201-5.

Item 65.1:

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 65.2:

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 65.3:

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 66: Contaminant List

Effective between the dates of 06/06/2001 and 06/06/2006

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

Item 66.1:

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

CAS No: 007647-01-0

Name: HYDROGEN CHLORIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

Condition 67: Air pollution prohibited

Effective between the dates of 06/06/2001 and 06/06/2006

New York State Department of Environmental Conservation

Permit ID: 9-1448-00272/00012

Facility DEC ID: 9144800272



Applicable State Requirement: 6NYCRR 211.2

Item 67.1:

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.