

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 9-1499-00067/00012 Renewal Number: 1 Modification Number: 1



07/26/2007

Facility Identification Data

Name: ISG LACKAWANNA LLC
Address: 3175 LAKESHORE RD
BLASDELL, NY 14219

Owner/Firm

Name: ISG LACKAWANNA LLC
Address: 3175 LAKESHORE RD
BUFFALO, NY 14219, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
Name: JEFFREY E DIETZ
Address: 270 MICHIGAN AVE
BUFFALO, NY 14203-2999

Division of Air Resources:
Name: ALAN J ZYLINSKI
Address: 270 MICHIGAN AVENUE
BUFFALO, NY 14203-2999

Air Permitting Facility Owner Contact:
Name: MYLES R LALLEY
Address: ISG LACKAWANNA LLC
3175 LAKESHORE RD
BUFFALO, NY 14219-1407
Phone:7168213213

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

This is a modification to the Title V Renewal Permit. According to 40CFR 63-CCC.1161(a), the owner or operator shall conduct an initial performance test for each process or emission control device to determine and demonstrate compliance with the applicable emission limitation according to the



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requirements in §63.7 of subpart A of this part and in this section. There are two allowable ways to perform this and the second way was inadvertently not included in the renewal permit.

Attainment Status

ISG LACKAWANNA LLC is located in the town of HAMBURG in the county of ERIE. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

This facility processes steel coils to specific customer requirements. The #3 Pickle Line uses hydrochloric acid dip tanks to remove scale from the steel strip. The Batch Annealing consists of natural gas-fired ovens ranging from 20.8 to 26.6 MMBtu/hr. The steel can also be processed on a Tandem Mill or Temper Mill. The Galvanize Line consists of pickling and cleaning sections, a 46.2 MMBtu/hr natural gas-fired flux drying oven, the zinc coating pot, a natural gas-fired 40 MMBtu/hr post anneal furnace followed by a post coating treatment section. Supporting operations for the facility consist of 2 roll shot blasters, grinders and a water treatment area containing lime silos.

Permit Structure and Description of Operations

The Title V permit for ISG LACKAWANNA LLC is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission



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units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

ISG LACKAWANNA LLC is defined by the following emission unit(s):

Emission unit 200001 - 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. Two spent pickle liquor tanks are vented to the pickling fume exhaust system. 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.

Emission unit 200001 is associated with the following emission points (EP):
52203

It is further defined by the following process(es):

Process: 110 is located at Southwest corner, Building 412 - #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.

Process: 120 is located at Southwest corner, Building 412 - #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.

Process: 130 is located at Southwest corner, Building 412 - #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.

Process: 140 is located at Southwest corner, Building 412 - #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 unit 200003 - Batch annealing is a heat treating process in which steel coils are heated in an inert atmosphere to a temperature of approximately 1300 deg. F., held at that temperature for a specified time period and cooled to ambient temperatures. Annealing is the only process in this unit and its

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emission points are the roof monitors above the annealing bases. The annealing furnaces are located in the cold mill building. 12 batch anneal furnaces are rated at 20.7 MMBtu/hr. All are fired on natural gas only.

Emission unit 200003 is associated with the following emission points (EP):
77090, 77100

It is further defined by the following process(es):

Process: 200 is located at East side of bldg, Building 412 - Annealing - The heat treating process consists of heating the coils in an inert atmosphere to temperature of about 1300 deg. F, holding at that temperature for a specified time period, and then cooling to ambient temperatures. Coils are stacked on pedestals, coated lightly with powder to prevent sticking and covered with a steel cover which is filled with inert gas. A furnace is placed over the stacks and fired with natural gas. Inert gas is piped into the facility from offsite.

Emission unit 200002 - 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 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.

It is further defined by the following process(es):

Process: 160 is located at Middle of building, Building 412 - 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.

Process: 170 is located at Middle of building, Building 412 - 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.

Process: 190 is located at Middle of building, Building 412 - Packaging/Oiling - Coils can be oiled and packaged on either #1 or 2 Packaging Line before shipment. This process has insignificant emissions.

Emission unit 200004 - 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.

It is further defined by the following process(es):

Process: 220 is located at Middle/West Side, Building 412 - 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 unit 200005 - 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 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.

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Emission unit 200005 is associated with the following emission points (EP):
68301, 68303, 68304

It is further defined by the following process(es):

Process: 240 is located at West Side, Building 757 - 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.

Process: 250 is located at Middle/West Side, Building 757 - 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.

Process: 260 is located at Middle of building, Building 757 - Hot Dip Galvanize Line-Drying/Preheating - After the cleaning section, the strip passes through a natural gas-fired drying and preheating furnace.

Process: 270 is located at Middle of building, Building 757 - 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 zinc thickness to the desired level. Emissions are controlled by a wet scrubber.

Process: 280 is located at Middle of building, Building 757 - Hot Dip Galvanize Line-Annealing - After being coated with zinc, the strip can be annealed in a natural gas-fired continuous annealing furnace.

Process: 290 is located at Middle of building, Building 757 - 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.

Process: 300 is located at Middle/East Side, Building 757 - 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 one natural gas-fired dryer.

Process: 320 is located at East Side, Building 757 - Hot Dip Galvanize Line-Oiling - Oil is applied as a protective coating to the strip before it is coiled. This process has insignificant emissions.

Process: 370 is located at South Side, Building 757 - Hot Dip Galvanize Line-Slitting/Oiling - Before shipping, coils can be slit to customers requirements on either Slitter & Oiler. An oiler applies a protective coating to the strip. This process has insignificant emissions.

Emission unit 200007 - 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.

It is further defined by the following process(es):

Process: 340Chemical 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.

Process: 350 is located at Ground, Building 2005 - Filtration - The thickener overflow discharges to a filter system before being discharged to Smokes Creek. This process has insignificant emissions.

Process: 360Holding - 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

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liquor loadout. This process has insignificant emissions.

Title V/Major Source Status

ISG LACKAWANNA LLC is subject to Title V requirements. This determination is based on the following information:

This facility is major for HAPs and Particulates.

Program Applicability

The following chart summarizes the applicability of ISG LACKAWANNA LLC with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

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NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements

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SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3316	COLD FINISHING OF STEEL SHAPES

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
3-09-005-00	FABRICATED METAL PRODUCTS FABRICATED METAL PRODUCTS - WELDING FABRICATED METAL PROD-WELDING: GENERAL
3-03-015-80	PRIMARY METAL PRODUCTION PRIM METAL PROD-INTEGRATED IRON & STEEL MFG (SEE 3-03-008 & 3-03-009)
3-03-009-36	MISCELLANEOUS COMBUSTION SOURCES PRIMARY METAL PRODUCTION PRIM METAL PROD-STEEL MFG(SEE 303015 FOR INTEGRATED IRON & STEEL MACT)
3-03-009-35	Coating: Tin, Zinc, etc. PRIMARY METAL PRODUCTION PRIM METAL PROD-STEEL MFG(SEE 303015 FOR INTEGRATED IRON & STEEL MACT)
3-03-009-34	Cold Rolling PRIMARY METAL PRODUCTION PRIM METAL PROD-STEEL MFG(SEE 303015 FOR INTEGRATED IRON & STEEL MACT)
3-03-009-10	Heat Treating Furnaces: Annealing PRIMARY METAL PRODUCTION PRIM METAL PROD-STEEL MFG(SEE 303015 FOR INTEGRATED IRON & STEEL MACT)
3-04-022-11	Pickling SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - METAL HEAT TREATING
3-04-007-15	Quenching SECONDARY METAL PRODUCTION SECONDARY METAL PRODUCTION - STEEL FOUNDRIES
5-03-007-02	Finishing SOLID WASTE DISPOSAL - INDUSTRIAL SOLID WASTE DISPOSAL: INDUSTRIAL - LIQUID WASTE SOLID WASTE DISPOSAL-INDUSTRIAL-LIQUID WASTE
5-03-008-99	TREATMENT-GENERAL SOLID WASTE DISPOSAL - INDUSTRIAL



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SOLID WASTE DISPOSAL: INDUSTRIAL - TREATMENT, STORAGE,
DISPOSAL /TSD
GENERAL: FUGITIVE EMISSIONS

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
007647-01-0	HYDROGEN CHLORIDE (HAP)		> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6NYCRR Part 201-1.5

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

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

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

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

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

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

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

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

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

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

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

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

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

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revocation and reissuance, or modification; or for denial of a permit renewal application.

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

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

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

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

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

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

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

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

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be

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deemed to be incorporated into the permit.

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

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

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all

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criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	56
FACILITY	40CFR 63-A.10	Recordkeeping and Reporting	30, 31
FACILITY	40CFR 63-A.4	Prohibited Activities and Circumvention	25
FACILITY	40CFR 63-A.6 (e) (1) (i)	Operation and Maintenance (MACT Gen. Prov.)	26
FACILITY	40CFR 63-A.6 (e) (3)	Startup, Shutdown and Malfunction Plan	27
FACILITY	40CFR 63-A.8	Monitoring Requirements	28
FACILITY	40CFR 63-A.9	Notification Requirements	29
2-00001	40CFR 63-CCC.1155	Steel Pickling NESHAP - Applicability	35
2-00001	40CFR 63-CCC.1159	Operational/equipment standards	36
2-00001	40CFR 63-CCC.1160 (a)	Compliance dates	37
2-00001	40CFR 63-CCC.1160 (b)	Maintenance requirements	38
2-00001	40CFR 63-CCC.1161 (a)	Initial performance testing - demonstration of compliance	1-1, 39
2-00001	40CFR 63-CCC.1161 (b)	Establishment of scrubber operating parameters	40
2-00001	40CFR 63-CCC.1162 (a) (2)	Wet scrubber monitoring	41
2-00001	40CFR 63-CCC.1162 (c)	Hydrochloric acid storage vessel inspection	42
2-00001	40CFR 63-CCC.1163 (b)	Request for extension of compliance	43
2-00001	40CFR 63-CCC.1165	Recordkeeping requirements	44
FACILITY	40CFR 63-DDDDD	Boilers and Process Heaters NESHAP rule	32
FACILITY	40CFR 68	Chemical accident prevention provisions	21



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FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	22
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
FACILITY	6NYCRR 200.7	Maintenance of equipment.	10
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	57
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	11
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	12
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	13
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	14
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit Conditions	23, 33, 34
FACILITY	6NYCRR 201-6.5(a) (4)	General conditions	15
FACILITY	6NYCRR 201-6.5(a) (7)	General conditions	
Fees 2			
FACILITY	6NYCRR 201-6.5(a) (8)	General conditions	16
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5(c) (2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5(c) (3) (ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5(d) (5)	Compliance schedules	17
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	6
FACILITY	6NYCRR 201-6.5(f) (6)	Off Permit Changes	18
FACILITY	6NYCRR 202-1.1	Required emissions tests.	19
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	7
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	8
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	58
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	20
2-00001/-/130	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	45
2-00001/52203	6NYCRR 212.3(a)	General Process Emission Sources - emissions from existing emission sources	47
2-00005/68301/270	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or	54



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2-00001/-/130	6NYCRR 212.6 (a)	modifications General Process Emission Sources - opacity of emissions limited	46
2-00002	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	48
2-00005/68301/250	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	53
2-00005/68304/260	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	55
2-00005/-/270	6NYCRR 212.6 (b)	Equivalent Opacity Standard	49, 50, 51, 52
FACILITY	6NYCRR 215	Open Fires	9

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

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6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6NYCRR Part 201-3.3(a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to 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.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR 201-6.5(a)(4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.



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6NYCRR 201-6.5(a)(8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)(ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

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6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak

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repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, ISG LACKAWANNA LLC has been determined to be subject to the following regulations:

40CFR 63-A.10

Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot" items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.

40CFR 63-A.4

Section 63.4 outlines generally prohibited activities such as operating in noncompliance with applicable standards and circumventing the rules. It requires sources to comply with Part 63 requirements regardless of whether those requirements have been included in a title V (NYCRR Part 201-6) permit for the source. Intentional or unintentional concealment of an emission that would otherwise violate a standard is itself a violation.

40CFR 63-A.6 (e) (1) (i)

Paragraph 63.6(e) requires that affected sources including air pollution control equipment must be operated and maintained to minimize emissions "at least to the level required by all relevant standards." It further requires that this be done at all time including during periods of startup, shutdown, and malfunction (SSM). Also operation during those times must be according to a SSM plan. §63.6(f) indicates however that nonopacity emission standards do not apply during SSM periods. Thus at those times the owner or operator must minimize emissions.

40CFR 63-A.6 (e) (3)

Paragraph 63.6(e)(3) requires a startup, shutdown, and malfunction (SSM) plan for MACT-affected sources and that the plan be followed.

40CFR 63-A.8

Section 63.8 covers default monitoring requirements for continuous or periodic parameter monitoring, continuous opacity monitoring, and continuous emission monitoring. It specifies continuous monitoring system performance evaluation notification, testplan, conduct and reporting requirements.

40CFR 63-A.9

Section 63.9 contains default notification requirements and deadlines for initial notifications (existing source: 120 days from promulgation; new source: dependent on size and timing), requests for extension of compliance (dependent on type of extension), notification that a source is subject to special compliance requirements (no later than initial notification), performance test notification (60 days before test), continuous monitoring related notifications (60 days before performance evaluation), and notifications of compliance status (also referred to as initial compliance reports; 60 days after completion of relevant compliance demonstration activity).

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40CFR 63-CCC.1155

The provisions of this subpart apply to all new and existing steel pickling facilities that pickle carbon steel using hydrochloric acid solution that contains 6 percent or more by weight HCl and is at a temperature of 100 °F or higher and are major sources for hazardous air pollutants (HAP) or are parts of facilities that are major sources for HAP:

For the purposes of implementing this subpart, the affected sources at a facility or plant subject to this subpart are as follows: Continuous and batch pickling lines, hydrochloric acid regeneration plants, and hydrochloric acid storage vessels.

40CFR 63-CCC.1159

The owner or operator of an affected plant must operate the affected plant at all times while in production mode in a manner that minimizes the proportion of excess air fed to the process and maximizes the process offgas temperature consistent with producing usable regenerated acid or iron oxide.

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.

40CFR 63-CCC.1160 (a)

The owner or operator of an affected existing steel pickling facility and/or hydrochloric acid regeneration plant subject to this subpart shall achieve initial compliance with the requirements of this subpart no later than June 22, 2001.

40CFR 63-CCC.1160 (b)

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.

40CFR 63-CCC.1161 (a)

The owner or operator shall conduct an initial performance test for each process or emission control device to determine and demonstrate compliance with the applicable emission limitation according to the requirements in §63.7 of subpart A of this part and in this section.

40CFR 63-CCC.1161 (b)

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 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

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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 paragraph (a)(2) of this section. 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.

40CFR 63-CCC.1162 (a) (2)

The owner or operator of a new, reconstructed, or existing steel pickling facility or acid regeneration plant subject to this subpart shall:

In addition to conducting performance tests, if a wet scrubber is used as the emission control device, install, operate, and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. These flow rates 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 and recirculation water flow rate less than the minimum values 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.

40CFR 63-CCC.1162 (c)

The owner or operator of an affected hydrochloric acid storage vessel shall 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.

40CFR 63-CCC.1163 (b)

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 Administrator (or the State with an approved permit program) a request for an extension of compliance as specified in §§63.6(i)(4) through 63.6(i)(6) of subpart A of this part.

40CFR 63-CCC.1165

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);
- (2) The occurrence and duration of each malfunction of the air pollution control equipment;
- (3) All maintenance performed on the air pollution control equipment;

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- (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 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 recordkeeping 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 recordkeeping 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.

40CFR 63-DDDDD

This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

6NYCRR 212 .3 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for existing (on or before July 1, 1973) process emission sources.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible



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Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 212 .6 (b)

Upon written application by a source owner or operator, the commissioner, at his discretion may accept for an emission source an equivalent opacity standard exceeding the opacity standard of subdivision (a) of this section, if the source owner can demonstrate through acceptable tests for such source that he is in compliance with all applicable emission requirements other than the opacity standard and that the source and any associated emission control equipment is being operated and maintained in a manner acceptable to the commissioner. An equivalent opacity standard for an emission source will only be granted where reasonably available control technology, as determined by the commissioner, has been utilized. In such cases, the source owner or operator will not cause or allow emissions to exceed the equivalent opacity.

Compliance Certification

Summary of monitoring activities at ISG LACKAWANNA LLC:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
2-00001	intermittent emission testing	1-1
2-00001	intermittent emission testing	39
2-00001	record keeping/maintenance procedures	41
2-00001	record keeping/maintenance procedures	42
2-00001	record keeping/maintenance procedures	44
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	6
FACILITY	record keeping/maintenance procedures	7
2-00001/-/130	record keeping/maintenance procedures	45
2-00005/68301/270	intermittent emission testing	54
2-00001/-/130	monitoring of process or control device parameters as surrogate	46
2-00002	monitoring of process or control device parameters as surrogate	48
2-00005/68301/250	monitoring of process or control device parameters as surrogate	53
2-00005/68304/260	monitoring of process or control device parameters as surrogate	55
2-00005/-/270	monitoring of process or control device parameters as surrogate	49
2-00005/-/270	monitoring of process or control device parameters as surrogate	50
2-00005/-/270	record keeping/maintenance procedures	51
2-00005/-/270	monitoring of process or control device parameters as surrogate	52

Basis for Monitoring

The owner or operator will install, operate, and maintain systems for the measurement and recording of

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the scrubber makeup water flow rate.

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.

A computerized maintenance system is used to keep the pickle line scrubber in optimum working order. This system includes regular inspection and maintenance on the scrubber's spray nozzles, pipes, shafts, belts, pulleys and fan bearings.

A performance test was completed confirming that this process complies with 6 NYCRR Part 212.6(a) when operating the control equipment.

Subpart DDDDD establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

An alternate opacity limit was proposed by Bethlehem Steel (presently ISG Lackawanna) 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.