MAJOR SOURCE OPERATING PERMIT

PERMITTEE: AM/NS CALVERT LLC

FACILITY NAME: AM/NS CALVERT LLC

FACILITY/PERMIT NO.: 503-0095

LOCATION: CALVERT, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: DRAFT

Effective Date: DRAFT

Expiration Date: DRAFT

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1. **Transfer** This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in Rule 335-3-16-.13(1)(a)5.	Rule 335-3-16-.02(6)
2. **Renewals** An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit. The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	Rule 335-3-16-.12(2)
3. **Severability Clause** The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	Rule 335-3-16-.05(e)
4. **Compliance** (a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	Rule 335-3-16-.05(f)
(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	Rule 335-3-16-.05(g)

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5. **Termination for Cause**	
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 will not stay any permit condition.	Rule 335-3-16-.05(h)
6. **Property Rights**	
The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	Rule 335-3-16-.05(i)
7. **Submission of Information**	
The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	Rule 335-3-16-.05(j)
8. **Economic Incentives, Marketable Permits, and Emissions Trading**	
No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	Rule 335-3-16-.05(k)
9. **Certification of Truth, Accuracy, and Completeness:**	
Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. 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.	Rule 335-3-16-.07(a)
10. **Inspection and Entry**	
Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized	Rule 335-3-16-.07(b)

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representatives of the Alabama Department of Environmental Management and EPA to conduct the following: (a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit; (b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit; (c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit; (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.	
11. **Compliance Provisions** (a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance. (b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.	Rule 335-3-16-.07(c)
12. **Compliance Certification** A compliance certification shall be submitted annually within 60 days of the effective date of this permit. (a) The compliance certification shall include the following: (1) The identification of each term or condition of this permit that is the basis of the certification; (2) The compliance status; (3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule	Rule 335-3-16-.07(e)

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335-3-16-.05(c) (Monitoring and Recording Keeping Requirements); (4) Whether the method(s) or other means used to assure compliance provided continuous or intermittent data; (5) Such other facts as the Department may require to determine the compliance status of the source; (b) The compliance certification shall be submitted to: Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to: Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303	
13. **Reopening for Cause** Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit: (a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (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. (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit. (c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.	Rule 335-3-16-.13(5)

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(d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.	
14. **Additional Rules and Regulations**	
This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.	§22-28-16(d), Code of Alabama 1975, as amended
15. **Equipment Maintenance or Breakdown**	
(a) In case of shutdown of air pollution control equipment for scheduled maintenance, the intent to shut down shall be reported to the Department at least 24 hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.	Rule 335-3-1-.07(1),(2)
(1) Identification of the specific facility to be taken out of service as well as its location and permit number;	
(2) The expected length of time that the air pollution control equipment will be out of service;	
(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;	
(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;	
(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.	
(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify	

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the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director will be notified when the breakdown has been corrected.	
16. **Operation of Capture and Control Devices**	
All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.	§22-28-16(d), Code of Alabama 1975, as amended
17. **Obnoxious Odors**	
This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.	Rule 335-3-1-.08
18. **Fugitive Dust**	
(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.	Rule 335-3-4-.02
(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne:	
(1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;	
(2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created;	
(3) By paving;	

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(4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions; or (5) By any combination of the above methods which results in the prevention of dust becoming airborne from the road surface.	
19. **Additions and Revisions** Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.	Rule 335-3-16-.13 and .14
20. **Recordkeeping Requirements** (a) Records of required monitoring information of the source shall include the following: (1) The date, place, and time of all sampling or measurements; (2) The date analyses were performed; (3) The company or entity that performed the analyses; (4) The analytical techniques or methods used; (5) The results of all analyses; and (6) The operating conditions that existed at the time of sampling or measurement.	Rule 335-3-16-.05(c)(2)
(b) Retention of records of all required monitoring data and support information of the source 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.	
21. **Reporting Requirements** (a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All	Rule 335-3-16-.05(c)(3)

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instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-16-.04(9). (b) Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	
22. **Emission Testing Requirements** Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised. The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations. To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter: (a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests. (b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures requires probe cleaning). (c) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.	Rule 335-3-1-.05(3) Rule 335-3-1-.04(1)

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(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances. A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis. All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.	
23. **Payment of Emission Fees** Annual emission fees shall be remitted each year according to the fee schedule in Rule 335-1-7-.04.	Rule 335-1-7-.04
24. **Other Reporting and Testing Requirements** Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.	Rule 335-3-1-.04(1)
25. **Title VI Requirements (Refrigerants)** Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F. No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F. The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.	40 CFR Part 82
26. **Chemical Accidental Prevention Provisions**	

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If a chemical listed in Table 1 of 40 CFR 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then: (a) The owner or operator shall comply with the provisions in 40 CFR Part 68. (b) The owner or operator shall submit one of the following: (1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a) or, (2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	40 CFR Part 68
27. **Display of Permit** This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will make the permit readily available for inspection by any or all persons who may request to see it.	Rule 335-3-14-.01(1)(d)
28. **Circumvention** No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.	Rule 335-3-1-.10
29. **Visible Emissions** Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.	Rule 335-3-4-.01(1)
30. **Fuel-Burning Equipment** (a) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may	Rule 335-3-4-.03

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discharge particulate emissions in excess of the emissions specified in Rule 335-3-4-.03.	
(b) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Rule 335-3-5-.01.	Rule 335-3-5-.01
31. **Process Industries – General**	
Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Rule 335-3-4-.04.	Rule 335-3-4-.04
32. **Averaging Time for Emission Limits**	Rule 335-3-1-.05
Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.	
33. **Compliance Assurance Monitoring (CAM)**	40 CFR Part 64
Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.	
(a) **Operation of Approved Monitoring**	40 CFR 64.7
(1) *Commencement of operation*. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).	
(2) *Proper maintenance*. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.	
(3) *Continued operation*. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span	

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	adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.	
(4)	*Response to excursions or exceedances*. (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be	

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		based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.	
	(5)	*Documentation of need for improved monitoring.* After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.	
(b)	**Quality Improvements Plan (QIP) Requirements**		40 CFR 64.8
	(1)	Based on the results of a determination made under Section 33(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.	

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(2) Elements of a QIP: i. The owner or operator shall maintain a written QIP, if required, and have it available for inspection. ii. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate: (I) Improved preventive maintenance practices. (II) Process operation changes. (III) Appropriate improvements to control methods. (IV) Other steps appropriate to correct control performance. (V) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(i)(I) through (IV) above). (3) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined. (4) Following implementation of a QIP, upon any subsequent determination pursuant to Section 33(a)(4)(b) above, the Department may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have: i. Failed to address the cause of the control device performance problems; or	

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ii. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.	
(5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.	
(c) **Reporting and Recordkeeping Requirements**	40 CFR 64.9
(1) *General reporting requirements*	
i. On and after the date specified in Section 33(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code r. 335-3-16-.05(c)3.	
ii. A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code r. 335-3-16-.05(c)3. and the following information, as applicable:	
(I) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;	
(II) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or	

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other daily calibration checks, if applicable); and (III) A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. (2) *General recordkeeping requirements* i. The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code r. 335-3-16-.05(c)2. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). ii. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	
(d) **Savings Provisions**	40 CFR 64.10

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Nothing in this part shall: (1) Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part. (2) Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable. (3) Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.	
34. **Permit Shield** (a) A permit shield exists under this operating permit in accordance with ADEM Admin. Code r. 335-3-16-.10 in that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance. The permit shield is based on the accuracy of the information supplied in Section 2 of the application for	Rule 335-3-16-.10

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this permit. Under this shield, it has been determined that requirements listed as non-applicable in Section 2 of the application are not applicable to this source. (b) Nothing in this permit shall alter or affect the following: (1) The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section; (2) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance. (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act; or (4) The ability of EPA to obtain information from a source pursuant to Section 114 of the Act.	

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Summary Page for Three 845 MMBtu/hr Natural Gas Fired Walking Beam Furnaces (S1-S3)

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S1	845 MMBtu/hr Walking Beam Furnace No. 1	NO_x	0.085 lb/MMBtu and 71.82 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S1	845 MMBtu/hr Walking Beam Furnace No. 1	CO	0.035 lb/MMBtu and 29.58 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S1	845 MMBtu/hr Walking Beam Furnace No. 1	VOC	0.0055 lb/MMBtu and 4.65 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S1	845 MMBtu/hr Walking Beam Furnace No. 1	PM/PM_{10}	0.0076 lb/MMBtu and 6.42 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S1	845 MMBtu/hr Walking Beam Furnace No. 1	SO_2	0.0006 lb/MMBtu and 0.507 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S1	845 MMBtu/hr Walking Beam Furnace No. 1	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S2	845 MMBtu/hr Walking Beam Furnace No. 2	NO_x	0.085 lb/MMBtu and 71.82 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S2	845 MMBtu/hr Walking Beam Furnace No. 2	CO	0.035 lb/MMBtu and 29.58 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S2	845 MMBtu/hr Walking Beam Furnace No. 2	VOC	0.0055 lb/MMBtu and 4.65 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S2	845 MMBtu/hr Walking Beam Furnace No. 2	PM/PM_{10}	0.0076 lb/MMBtu and 6.42 lb/hr	Rule 335-3-14-.04 (PSD/BACT)

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S2	845 MMBtu/hr Walking Beam Furnace No. 2	SO_2	0.0006 lb/MMBtu and 0.507 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S2	845 MMBtu/hr Walking Beam Furnace No. 2	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S3	845 MMBtu/hr Walking Beam Furnace No. 3	NO_x	0.085 lb/MMBtu and 71.82 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S3	845 MMBtu/hr Walking Beam Furnace No. 3	CO	0.035 lb/MMBtu and 29.58 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S3	845 MMBtu/hr Walking Beam Furnace No. 3	VOC	0.0055 lb/MMBtu and 4.65 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S3	845 MMBtu/hr Walking Beam Furnace No. 3	PM/PM_{10}	0.0076 lb/MMBtu and 6.42 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S3	845 MMBtu/hr Walking Beam Furnace No. 3	SO_2	0.0006 lb/MMBtu and 0.507 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S3	845 MMBtu/hr Walking Beam Furnace No. 3	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)

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Provisos for Three 845 MMBtu/hr Natural Gas Fired Walking Beam Furnaces (S1-S3)

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (PSD/BACT)
Emission Standards	
1. Nitrogen Oxide (NOx) emissions from each Walking Beam Furnace (S1-S3) shall not exceed 71.82 lb/hr and 0.085 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
2. Carbon Monoxide (CO) emissions from each Walking Beam Furnace (S1-S3) shall not exceed 29.58 lb/hr and 0.035 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
3. Volatile Organic Compound (VOC) emissions from each Walking Beam Furnace (S1-S3) shall not exceed 4.65 lb/hr and 0.0055 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
4. Particulate Matter (PM/PM_{10}) emissions from each Walking Beam Furnace (S1-S3) shall not exceed 6.42 lb/hr and 0.0076 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
5. Sulfur Dioxide (SO_2) emissions from each Walking Beam Furnace (S1-S3) shall not exceed 0.507 lb/hr and 0.0006 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
6. The sources covered by this permit shall fire only natural gas as a fuel.	Rule 335-3-14-.04 (PSD/BACT)
7. The opacity of emissions from these sources shall not exceed ten percent (10%) opacity as determined by a six (6) minute average.	Rule 335-3-14-.04 (PSD/BACT)
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05

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Federally Enforceable Provisos		Regulations
2.	Method 6 or 6C of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
3.	Method 7E of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05
4.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
5.	Method 10 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of carbon monoxide emissions.	Rule 335-3-1-.05
6.	Method 18 or 25a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of VOC emissions.	Rule 335-3-1-.05
Emission Monitoring		
1.	NOx and CO Emissions tests are to be conducted on each Walking Beam Furnace (S1-S3) at intervals not to exceed 2½ years following the date of the most recent compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing.	Rule 335-3-16-.05(c)
2.	The Permittee shall perform a visual check, at least once per day, of each stack associated with each Walking Beam Furnace (S1-S3). These checks shall be performed by a person familiar with Method 9. At any time, if any visible emissions are noted and not corrected within a period of one (1) hour, then a Method 9 observation must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed. Any repairs of observed problems shall be recorded.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements		
1.	The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)

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Summary Page for Roughing Mill with Wet ESP (S5a) and Finishing Mill with Wet ESP (S5)

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S5a	Roughing Mill w/ Wet ESP	PM/PM_{10}	0.0044 gr/dscf and 1.20 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S5a	Roughing Mill w/ Wet ESP	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S5	Finishing Mill w/ Wet ESP	PM/PM_{10}	0.0044 gr/dscf and 4.01 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S5	Finishing Mill w/ Wet ESP	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)

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Provisos for Roughing Mill with Wet ESP (S5a) and Finishing Mill with Wet ESP (S5)

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)].*"	Rule 335-3-14-.04 (PSD/BACT)
3. These sources are subject to the applicable requirements of 40 CFR Part 64, "*Compliance Assurance Monitoring*", as described in General Proviso No. 33.	40 CFR §64.2
Emission Standards	
1. Particulate matter (PM/PM_{10}) emissions from the Finishing Mill w/ Wet ESP (S5) shall not exceed 0.0044 gr/dscf and 4.01 lb/hr.	Rule 335-3-14-.04 (PSD/BACT)
2. Particulate matter (PM/PM_{10}) emissions from the Roughing Mill w/ Wet ESP (S5a) shall not exceed 0.0044 gr/dscf and 1.20 lb/hr.	Rule 335-3-14-.04 (PSD/BACT)
3. The opacity of emissions from these sources shall not exceed ten percent (10%) opacity as determined by a six (6) minute average.	Rule 335-3-14-.04 (PSD/BACT)
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
2. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
Emission Monitoring	
1. Reference Appendix C for the monitoring requirements for 40 CFR Part 64, "*Compliance Assurance Monitoring*".	40 CFR §64.7
2. The Permittee shall perform a visual check, at least once per day, of each stack associated with these units (S5 and S5a). These checks shall be performed by a person familiar with Method 9. At any time, if any visible emissions are noted and not corrected within a period of one (1) hour, then a Method	Rule 335-3-16-.05(c)

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Federally Enforceable Provisos	Regulations
9 observation must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed. Any repairs of observed problems shall be recorded.	
3. The Permittee shall continuously (at least once every 15 minutes) monitor the Wet ESPs (S5 and S5a) secondary voltages. The Wet ESP secondary voltages shall, on 3-hr block averages, be maintained at levels equal to or greater than that recorded during the latest emissions test that indicated compliance with the applicable emissions limits for periods when each individual compartment or both compartments together are in operation.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)
2. The facility shall maintain a record of the Wet ESPs (S5 and S5a) secondary voltages required under this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-16-.05(c)

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Summary Page for Coupled Continuous Pickling Line 1 and Tandem Mill

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S6	Processor and Stretcher/Leveler w/ Baghouse	PM/PM_{10}	0.005 gr/dscf and 2.185 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S6	Processor and Stretcher/Leveler w/ Baghouse	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S8	HCL Pickling and HCL Supply Tanks w/ Scrubber	HCL	6 ppmv	40 CFR §63.1158(a)(1)(i)
S8	HCL Pickling and HCL Supply Tanks w/ Scrubber	PM/PM_{10}	0.005 gr/dscf and 0.453 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S8	HCL Pickling and HCL Supply Tanks w/ Scrubber	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S12	Tandem Mill w/ Mist Eliminator	PM/PM_{10}	0.0025 gr/dscf and 4.32 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S12	Tandem Mill w/ Mist Eliminator	PMc (Condensable)	0.0058 gr/dscf and 10.03 lb/hr	Rule 335-3-14-.04
S12	Tandem Mill w/ Mist Eliminator	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)

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Provisos for Coupled Continuous Pickling Line 1 and Tandem Mill

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (PSD/BACT)
3. This source is subject to the applicable requirements of 40 CFR Part 63, Subpart CCC, "*National Emission Standards for Hazardous Air Pollutants for Steel Pickling-HCL Process Facilities and Hydrochloric Acid Regeneration Plants*".	40 CFR §63.1155(a)(1) Rule 335-3-11-.06(54)
4. This source is subject to the applicable requirements of 40 CFR Part 63, Subpart A, "*General Provisions*", as provided in Table 1 of 40 CFR Part 63, Subpart CCC.	40 CFR §63.1155(c) Rule 335-3-11-.06(1)
5. The Processor and Stretcher/Leveler (S6) and the Tandem Mill (S12) are subject to the applicable requirements of 40 CFR Part 64, "*Compliance Assurance Monitoring*", as described in General Proviso No. 33.	40 CFR §64.2
Emission Standards	
1. The owner or operator shall not cause or allow to be discharged into the atmosphere from the pickling lines: (a) Any gases that contain HCl in a concentration in excess of 6 ppmv; or (b) HCl at a mass emission rate that corresponds to a collection efficiency of less than 99 percent.	40 CFR §63.1158(a)(1)
2. Particulate matter (PM/PM_{10}) emissions from the baghouse associated with the Processor and Stretcher/Leveler (S6) shall not exceed 0.005 gr/dscf and 2.185 lb/hr.	Rule 335-3-14-.04 (PSD/BACT)
3. Particulate matter (PM/PM_{10}) emissions from the scrubber associated with the HCl Pickling Line 1 (S8) shall not exceed 0.005 gr/dscf and 0.453 lb/hr.	Rule 335-3-14-.04 (PSD/BACT)
4. Filterable particulate matter (PM/PM_{10}) emissions from the tandem mill (S12) shall not exceed 0.0025 gr/dscf and 4.32 lb/hr.	Rule 335-3-14-.04 (PSD/BACT)

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Federally Enforceable Provisos		Regulations
5.	Condensable particulate matter emissions from the tandem mill (S12) shall not exceed 0.0058 gr/dscf and 10.03 lb/hr.	Rule 335-3-14-.04 (PSD/BACT)
6.	The opacity of emissions from these sources shall not exceed ten percent (10%) opacity as determined by a six (6) minute average.	Rule 335-3-14-.04 (PSD/BACT)
7.	The owner or operator of an affected HCl storage 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.	40 CFR §63.1159(b)
Compliance and Performance Test Methods and Procedures		
1.	Compliance with the HCl limit will be determined by conducting emission tests in accordance with the procedures detailed in 40 CFR §63.1161(a), (b), & (d).	40 CFR §63.1162(a)(1)
2.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
3.	Method 202 of 40 CFR Part 51 (latest edition), Appendix M shall be used in the determination of condensable particulate matter emissions.	Rule 335-3-1-.05
4.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
Emission Monitoring		
1.	Reference Appendix C for the monitoring requirements for 40 CFR Part 64, "*Compliance Assurance Monitoring*".	40 CFR §64.7
2.	The Permittee shall prepare an operation and maintenance plan for the scrubber (S8) according to the requirements in 40 CFR §63.1160(b)(1). The plan must be consistent with good maintenance practices and at a minimum: (a) 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; (b) 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	40 CFR §63.1160(b)(1)

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Federally Enforceable Provisos	Regulations
system and scrubber fans and motors associated with those pumps and fans; (c) Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling; (d) Require an inspection of each scrubber at intervals of no less than 3 months with: i. Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices; ii. Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components; iii. Repair or replacement of droplet eliminator elements as needed; iv. Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and v. Adjustment of damper settings for consistency with the required air flow. (e) 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; (f) 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 40 CFR Part 63, Subpart CCC.	
3. The Permittee shall adhere to the monitoring requirements detailed in 40 CFR §63.1162(a)(1), (2), (4), (5), & (6) and 40 CFR §63.1162(c).	40 CFR §63.1162(a) 40 CFR §63.1162(c)
4. The Permittee shall conduct performance tests to measure the HCl mass flows at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in 40 CFR §63.1161. Performance tests shall be conducted either annually or	40 CFR §63.1162(a)(1)

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	Federally Enforceable Provisos	Regulations
	according to an alternative schedule that is approved by the applicable permitting authority, but no less frequently than every 2½ years or twice per title V permit term.	
5.	The Permittee shall install, operate, and maintain systems for the measurement and recording of the scrubber water conductivity and recirculation flow rate. The conductivity and recirculation flow rate must be monitored continuously and recorded at least once per shift while the scrubber is operating. The Permittee may develop and implement alternative monitoring requirements subject to approval by the Administrator.	40 CFR §63.1162(a)(2) 40 CFR §63.1162(a)(4) 40 CFR §63.1162(a)(6)
6.	The scrubber conductivity and recirculation flow rate monitoring devices 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.	40 CFR §63.1162(a)(5)
7.	Operation of the wet scrubber with excursions of scrubber water recirculation water flow rate outside the established range (based on the pump manufacturer's specification) will require initiation of corrective action as specified by the maintenance requirements in 40 CFR §63.1160(b)(2).	40 CFR §63.1162(a)(2) 40 CFR §63.1162(a)(6)
8.	Operation of the wet scrubber with excursions of scrubber water conductivity greater than the manufacturer's recommended maximum value (200 mS/cm) will require initiation of corrective action as specified by the maintenance requirements in 40 CFR §63.1160(b)(2).	40 CFR §63.1162(a)(2) 40 CFR §63.1162(a)(6)
9.	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.	40 CFR §63.1162(c)
10.	The Permittee shall maintain the pressure differential across the Tandem Mill Mist Eliminator System (S12) between 350 and 2,200 bar and shall monitor and record the pressure differential at least once daily. Corrective action must be performed within (2) two hours if the pressure differential falls out of the range established by the facility. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)

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Federally Enforceable Provisos		Regulations
11.	The facility shall perform visual checks, at least once per day, of the stacks associated with each unit. These checks shall be performed by a person familiar with Method 9. At any time, if estimated instantaneous visible emissions in excess of 10% opacity are observed and are not corrected within a period of 1 hour, then a Method 9 observation must be performed within 4 hours of the observations.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements		
1.	The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)
2.	The facility shall maintain a record of the Tandem Mill Mist Eliminator System (S12) pressure differential monitoring required under this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-16-.05(c)
3.	Concerning the pickling line, the facility shall adhere to the recordkeeping and reporting requirements detailed in 40 CFR §63.1164(a), (b), & (c) and 40 CFR §63.1165(a), (b)((1),(3)), & (c).	40 CFR §63.1164 40 CFR §63.1165

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Summary Page for Coupled Continuous Pickling Line 2

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S7	Processor and Stretcher/Leveler w/ Baghouse	PM/PM_{10}	0.005 gr/dscf and 2.185 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S7	Processor and Stretcher/Leveler w/ Baghouse	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S9	HCL Pickling and HCL Supply Tanks w/ Scrubber	HCL	6 ppmv	40 CFR §63.1158(a)(1)(i)
S9	HCL Pickling and HCL Supply Tanks w/ Scrubber	PM/PM_{10}	0.005 gr/dscf and 0.453 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S9	HCL Pickling and HCL Supply Tanks w/ Scrubber	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S10	Tank Farm Scrubber	HCL	N/A	N/A
S10	Tank Farm Scrubber	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)

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Provisos for Coupled Continuous Pickling Line 2

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (PSD/BACT)
3. This source is subject to the applicable requirements of 40 CFR Part 63, Subpart CCC, "*National Emission Standards for Hazardous Air Pollutants for Steel Pickling-HCL Process Facilities and Hydrochloric Acid Regeneration Plants*".	40 CFR §63.1155(a)(1) RULE 335-3-11-.06(54)
4. This source is subject to the applicable requirements of 40 CFR Part 63, Subpart A, "*General Provisions*", as provided in Table 1 of 40 CFR Part 63, Subpart CCC.	40 CFR §63.1155(c) Rule 335-3-11-.06(1)
5. The Processor and Stretcher/Leveler (S7) is subject to the applicable requirements of 40 CFR Part 64, "*Compliance Assurance Monitoring*", as described in General Proviso No. 33.	40 CFR §64.2
Emission Standards	
1. The owner or operator shall not cause or allow to be discharged into the atmosphere from the pickling lines: (a) Any gases that contain HCl in a concentration in excess of 6 ppmv; or (b) HCl at a mass emission rate that corresponds to a collection efficiency of less than 99 percent.	40 CFR §63.1158(a)(1)
2. Particulate matter (PM/PM_{10}) emissions from the baghouse associated with the Processor and Stretcher/Leveler (S7) shall not exceed 0.005 gr/dscf and 2.185 lb/hr.	Rule 335-3-14-.04 (PSD/BACT)
3. Particulate matter (PM/PM_{10}) emissions from the scrubber associated with the HCl Pickling Line 2 (S9) shall not exceed 0.005 gr/dscf and 0.453 lb/hr.	Rule 335-3-14-.04 (PSD/BACT)
4. The opacity of emissions from these sources shall not exceed ten percent (10%) opacity as determined by a six (6) minute average.	Rule 335-3-14-.04 (PSD/BACT)

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Federally Enforceable Provisos	Regulations
5. The owner or operator of an affected HCl storage 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.	40 CFR §63.1159(b)
Compliance and Performance Test Methods and Procedures	
1. Compliance with the HCl limit will be determined by conducting emission tests in accordance with the procedures detailed in 40 CFR §63.1161(a), (b), & (d).	40 CFR §63.1162(a)(1)
2. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
3. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
Emission Monitoring	
1. Reference Appendix C for the monitoring requirements for 40 CFR Part 64, "*Compliance Assurance Monitoring*".	40 CFR §64.7
2. The Permittee shall prepare an operation and maintenance plan for the scrubber (S9) according to the requirements in 40 CFR §63.1160(b)(1). The plan must be consistent with good maintenance practices and at a minimum: (a) 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; (b) 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; (c) Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling; (d) Require an inspection of each scrubber at intervals of no less than 3 months with:	40 CFR §63.1160(b)(1)

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Federally Enforceable Provisos			Regulations
		i. Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices; ii. Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components; iii. Repair or replacement of droplet eliminator elements as needed; iv. Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and v. Adjustment of damper settings for consistency with the required air flow.	
	(e)	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;	
	(f)	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 40 CFR Part 63, Subpart CCC.	
3.		The Permittee shall adhere to the monitoring requirements detailed in 40 CFR §63.1162(a)(1), (2), (4), (5), & (6) and 40 CFR §63.1162(c).	40 CFR §63.1162(a) 40 CFR §63.1162(c)
4.		The Permittee shall conduct performance tests to measure the HCl mass flows at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in 40 CFR §63.1161. Performance tests shall be conducted either annually or according to an alternative schedule that is approved by the applicable permitting authority, but no less frequently than every 2½ years or twice per Title V permit term.	40 CFR §63.1162(a)(1)

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	Federally Enforceable Provisos	Regulations
5.	The Permittee shall install, operate, and maintain systems for the measurement and recording of the scrubber water conductivity and recirculation flow rate. The conductivity and recirculation flow rate must be monitored continuously and recorded at least once per shift while the scrubber is operating. The Permittee may develop and implement alternative monitoring requirements subject to approval by the Administrator.	40 CFR §63.1162(a)(2) 40 CFR §63.1162(a)(4) 40 CFR §63.1162(a)(6)
6.	The scrubber conductivity and recirculation flow rate monitoring devices 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.	40 CFR §63.1162(a)(5)
7.	Operation of the wet scrubber with excursions of scrubber water recirculation water flow rate outside the established range (based on the pump manufacturer's specification) will require initiation of corrective action as specified by the maintenance requirements in 40 CFR §63.1160(b)(2).	40 CFR §63.1162(a)(2) 40 CFR §63.1162(a)(6)
8.	Operation of the wet scrubber with excursions of scrubber water conductivity greater than the manufacturer's recommended maximum value (200 mS/cm) will require initiation of corrective action as specified by the maintenance requirements in 40 CFR §63.1160(b)(2).	40 CFR §63.1162(a)(2) 40 CFR §63.1162(a)(6)
9.	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.	40 CFR §63.1162(c)
10.	The facility shall perform visual checks, at least once per day, of the stacks associated with each unit. These checks shall be performed by a person familiar with Method 9. At any time, if estimated instantaneous visible emissions in excess of 10% opacity are observed and are not corrected within a period of 1 hour, then a Method 9 observation must be performed within 4 hours of the observations. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)
	Recordkeeping and Reporting Requirements	
1.	The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall	Rule 335-3-16-.05(c)

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	Federally Enforceable Provisos	Regulations
	be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	
2.	Concerning the pickling line, the facility shall adhere to the recordkeeping and reporting requirements detailed in 40 CFR §63.1164(a), (b), & (c) and 40 CFR §63.1165(a), (b)((1),(3)), & (c).	40 CFR §63.1164 40 CFR §63.1165

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Summary Page for Skin Pass Mill with Mist Eliminator

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S36	Skin Pass Mill w/ Mist Eliminator	PM/PM_{10}	0.0025 gr/dscf and 0.68 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S36	Skin Pass Mill w/ Mist Eliminator	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)

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Provisos for Skin Pass Mill with Mist Eliminator

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (PSD/BACT)
3. This source is subject to the applicable requirements of 40 CFR Part 64, "*Compliance Assurance Monitoring*", as described in General Proviso No. 33.	40 CFR §64.2
Emission Standards	
1. Particulate matter (PM/PM_{10}) emissions from the baghouse associated with the Skin Pass Mill (S36) shall not exceed 0.0025 gr/dscf and 0.68 lb/hr.	Rule 335-3-14-.04 (PSD/BACT)
2. The opacity of emissions from this source shall not exceed ten percent (10%) opacity as determined by a six (6) minute average.	Rule 335-3-14-.04 (PSD/BACT)
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
2. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
Emission Monitoring	
1. Reference Appendix C for the monitoring requirements for 40 CFR Part 64, "*Compliance Assurance Monitoring*".	40 CFR §64.7

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Federally Enforceable Provisos		Regulations
2.	The facility shall perform visual checks, at least once per day, of the stack associated with this unit. These checks shall be performed by a person familiar with Method 9. At any time, if estimated instantaneous visible emissions in excess of 10% opacity are observed, and are not corrected within a period of 1 hour, then a Method 9 observation must be performed within 4 hours of the observations. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements		
1.	The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)

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Summary Page for Roll Shop Chrome Plating Operations

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S14	Chrome Plating w/ Mist Eliminator	Chromium	0.015 mg /dscm	40 CFR §63.342(c)(1)
S14	Chrome Plating w/ Mist Eliminator	Opacity	(See General Proviso 29)	Rule 335-3-4-.01(1) (SIP)

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Provisos for Roll Shop Chrome Plating Operations

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.01, "*Control of Particulate Emissions – Visible Emissions*".	Rule 335-3-4-.01
3. This source is subject to the applicable requirements of 40 CFR Part 63, Subpart N, "*National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*".	40 CFR §63.340(a) Rule 335-3-11-.06(13)
4. This source is subject to the applicable requirements of 40 CFR Part 63, Subpart A, "*General Provisions*", as provided in Table 1 of 40 CFR Part 63, Subpart N.	40 CFR §63.340(b) Rule 335-3-11-.06(1)
Emission Standards	
1. The opacity of emissions from this source shall not exceed the standards specified in General Proviso No. 29.	Rule 335-3-4-.01(1)
2. The Permittee shall adhere to the applicable standards detailed in 40 CFR §63.342(a), (b), (c), (f) & (g).	40 CFR §63.342
3. During tank operation, the concentration of total chromium in the exhaust gas stream discharged to the atmosphere shall not exceed 0.015 milligrams of total chromium per dry standard cubic meter of ventilation air.	40 CFR §63.342(c)(1)(ii)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Performance tests shall be conducted using the test methods and procedures detailed in 40 CFR §63.344.	40 CFR §63.344
3. Method 306 or 306A, "Determination of Chromium Emissions from Decorative and Hard Chromium Electroplating and Anodizing Operations," of 40 CFR Part 63, Appendix A shall be used to determine chromium concentration.	40 CFR §63.344(c)(1)
Emission Monitoring	

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	Federally Enforceable Provisos	Regulations
1.	This unit is subject to the applicable operation and maintenance practices in 40 CFR §63.342(f).	40 CFR §63.342(f)
2.	The Permittee shall prepare an operation and maintenance plan according to the requirements in 40 CFR §63.342(f)(3). The plan must include the following elements: (a) The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment; (b) The plan shall incorporate the operation and maintenance practices for the air pollution control device and monitoring equipment, as identified in Table 1 of 40 CFR §63.342; (c) The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; (d) The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions; and (e) The plan shall include housekeeping procedures, as specified in Table 2 to 40 CFR §63.342. If actions taken by the owner or operator during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by 40 CFR §63.342(f)(3)(i), the owner or operator shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator.	40 CFR §63.342(f)(3)
3.	Once per quarter, the Permittee shall visually inspect the mist eliminator to ensure there is proper drainage, no chromic acid build-up on the pads, and no evidence of chemical attack on the structural integrity of the device.	Table 1 to 40 CFR §63.342

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	Federally Enforceable Provisos	Regulations
4.	Once per quarter, the Permittee shall visually inspect the back portion of the mesh pad closet to the fan to ensure there is no breakthrough of chromic acid mist.	Table 1 to 40 CFR §63.342
5.	Once per quarter, the Permittee shall visually inspect ductwork from the tank(s) to the control device to ensure there are no leaks.	Table 1 to 40 CFR §63.342
6.	The Permittee shall perform washdowns of composite mesh pads in accordance with manufacturer's recommendations.	Table 1 to 40 CFR §63.342
7.	The Permittee shall employ the applicable Housekeeping Practices in Table 2 to 40 CFR §63.342.	Table 2 to 40 CFR §63.342
8.	The Permittee shall monitor and record the pressure drop across the composite mesh pad mist eliminator and the control device installed upstream of the composite mesh pad to prevent plugging, once each day that any affected source is operating. To be in compliance with the standards, the composite mesh pad mist eliminator and the upstream control device shall be operated below 3.96 inches of water column of pressure drop..	40 CFR §63.343(c)(4)(ii)
Recordkeeping and Reporting Requirements		
1.	The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)
2.	The Permittee shall fulfill all reporting requirements outlined in 40 CFR §63.347, including the Notification of Performance Test according to 40 CFR §63.347(d), Notification of Compliance Status according to 40 CFR §63.347(e), and Reports of Performance Test results according to 40 CFR §63.347(f).	40 CFR §63.347
3.	If actions taken during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by 40 CFR §63.342(f)(3)(i), the Permittee shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the owner or operator makes alternative reporting arrangements, in advance, with the Administrator.	40 CFR §63.342(f)(3)(iv)

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Federally Enforceable Provisos	Regulations
4. The Permittee shall fulfill all recordkeeping requirements outlined in 40 CFR §63.346 including the following: (a) Inspection records for the add-on air pollution control device and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of 40 CFR §63.342(f) and Table 1 to 40 CFR §63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection. (b) Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment, except routine housekeeping practices. (c) Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment. (d) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR §63.342(a)(1), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (e) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by 40 CFR §63.342(f)(3). (f) Test reports documenting results of all performance tests. (g) Records of monitoring data required by 40 CFR §63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected. (h) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment. (i) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data,	40 CFR §63.346(a) 40 CFR §63.346(b)

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Federally Enforceable Provisos	Regulations
that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment. (j) The total process operating time of the affected source during the reporting period. (k) Records of the actual cumulative rectifier capacity of hard chromium electroplating tanks at a facility expended during each month of the reporting period, and the total capacity expended to date for a reporting period. (l) All documentation supporting the notifications and reports required by 40 CFR §§63.9, 63.10, and 63.347.	
5. The Permittee must submit Semiannual Ongoing Compliance Status Reports according to 40 CFR §63.347(g). The report must contain the following information: (a) The company name and address of the affected source. (b) An identification of the operating parameter that is monitored for compliance determination, as required by 40 CFR §63.343(c). (c) The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by §63.343(e). (d) The beginning and ending dates of the reporting period. (e) A description of the type of process performed in the affected source. (f) The total operating time of the affected source during the reporting period. (g) The actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis. (h) A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess	40 CFR §63.347(g)

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Federally Enforceable Provisos	Regulations
emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes.	
(i) A certification by a responsible official, as defined in 40 CFR §63.2, that the work practice standards in 40 CFR §63.342(f) were followed in accordance with the operation and maintenance plan for the source.	
(j) If the operation and maintenance plan required by 40 CFR §63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by 40 CFR §63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed.	
(k) A description of any changes in monitoring, processes, or controls since the last reporting period.	
(l) The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR §63.342(a)(1), including actions taken to correct a malfunction.	
(m) The name, title, and signature of the responsible official who is certifying the accuracy of the report and the date of the report.	

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Summary Page for Three Natural Gas-Fired Boilers w/ LNB, 70 MMBtu/hr each, (S37-S39)

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S37 S38 S39	Natural Gas Boiler #1 (70 MMBtu/hr) Natural Gas Boiler #2 (70 MMBtu/hr) Natural Gas Boiler #3 (70 MMBtu/hr)	PM/PM_{10}	0.53 lb/hr and 0.0076 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S37 S38 S39	Natural Gas Boiler #1 (70 MMBtu/hr) Natural Gas Boiler #2 (70 MMBtu/hr) Natural Gas Boiler #3 (70 MMBtu/hr)	NO_x	2.45 lb/hr and 0.035 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S37 S38 S39	Natural Gas Boiler #1 (70 MMBtu/hr) Natural Gas Boiler #2 (70 MMBtu/hr) Natural Gas Boiler #3 (70 MMBtu/hr)	SO_2	0.04 lb/hr and 0.0006 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S37 S38 S39	Natural Gas Boiler #1 (70 MMBtu/hr) Natural Gas Boiler #2 (70 MMBtu/hr) Natural Gas Boiler #3 (70 MMBtu/hr)	CO	2.80 lb/hr and 0.04 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S37 S38 S39	Natural Gas Boiler #1 (70 MMBtu/hr) Natural Gas Boiler #2 (70 MMBtu/hr) Natural Gas Boiler #3 (70 MMBtu/hr)	VOC	0.39 lb/hr and 0.0055 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S37 S38 S39	Natural Gas Boiler #1 (70 MMBtu/hr) Natural Gas Boiler #2 (70 MMBtu/hr) Natural Gas Boiler #3 (70 MMBtu/hr)	Opacity	(See General Proviso 29)	Rule 335-3-4-.01(1)

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Provisos for Three Natural Gas-Fired Boilers w/ LNB, 70 MMBtu/hr each, (S37-S39)

	Federally Enforceable Provisos	Regulations
Applicability		
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.01, "*Control of Particulate Emissions – Visible Emissions*".	Rule 335-3-4-.01
3.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (PSD/BACT)
4.	These sources are subject to the applicable requirements of 40 CFR Part 63, Subpart DDDDD, "*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*".	40 CFR §63.7485 Rule 335-3-11-.06(108)
5.	These sources are subject to the applicable requirements of 40 CFR Part 63, Subpart A, "*General Provisions*", as provided in Table 10 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7565 Rule 335-3-11-.06(1)
6.	These sources are subject to the applicable requirements of 40 CFR Part 60, Subpart Dc, "*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*".	40 CFR §60.40c(a) Rule 335-3-10-.02(2)(c)
Emission Standards		
1.	Nitrogen Oxide (NOx) emissions from each Natural Gas-Fired Boiler (S37-S39) shall not exceed 2.45 lb/hr and 0.035 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
2.	Carbon Monoxide (CO) emissions from each Natural Gas-Fired Boiler (S37-S39) shall not exceed 2.80 lb/hr and 0.04 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
3.	Volatile Organic Compound (VOC) emissions from each Natural Gas-Fired Boiler (S37-S39) shall not exceed 0.39 lb/hr and 0.0055 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
4.	Particulate Matter (PM/PM_{10}) emissions from each Natural Gas-Fired Boiler (S37-S39) shall not exceed 0.53 lb/hr and 0.0076 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)

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Federally Enforceable Provisos	Regulations
5. Sulfur Dioxide (SO_2) emissions from each Natural Gas-Fired Boiler (S37-S39) shall not exceed 0.04 lb/hr and 0.0006 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
6. The Natural Gas-Fired Boilers (S37-S39) shall fire only natural gas as a fuel.	Rule 335-3-14-.04 (PSD/BACT)
7. The opacity of emissions from these sources shall not exceed the standards specified in General Proviso No. 29.	Rule 335-3-4-.01(1)
8. These sources are subject to Work Practice Standards in 40 CFR §63.7500 and Table 3 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7500
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
2. Method 6 or 6C of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
3. Method 7E of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05
4. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
5. Method 10 of 40 CFR Part 60, Appendix A shall be used in the determination of carbon monoxide.	Rule 335-3-1-.05
6. Method 18 or 25a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of VOC emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. The facility shall conduct a tune-up of each boiler annually to demonstrate continuous compliance. The following activities shall be performed: (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months. (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern.	40 CFR §63.7540(a)(10)

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Federally Enforceable Provisos	Regulations
The adjustment should be consistent with the manufacturer's specifications, if available. (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. (d) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available. (e) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). (f) Maintain on-site and submit, if requested by the Department, an annual report containing the following information: i. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler. ii. A description of any corrective actions taken as a part of the combustion adjustment. iii. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.	
If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.	40 CFR §63.7540(a)(13)
2. NOx and CO emissions tests are to be conducted on each Natural Gas-Fired Boiler (S37-S39) at intervals not to exceed 2½ years following the date of the most recent compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall	Rule 335-3-16-.05(c)

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	Federally Enforceable Provisos	Regulations
	be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	
2.	The Permittee shall record and maintain records of the amounts of each fuel combusted during each day. The records shall be retained for at least two (2) years from the date of generation and available upon request.	40 CFR §60.48c(g)(1) 40 CFR §60.48c(i)
3.	The Permittee shall fulfill all applicable notification, reporting and recordkeeping requirements outlined in 40 CFR §§63.7545, 63.7550 and 63.7555.	40 CFR §63.7545 40 CFR §63.7550 40 CFR §63.7555

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Summary Page for Continuous Hot Dip Galvanizing Line 1

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S15	CHDGL 1 Cleaning Section w/ Mist Eliminator and Dryer (1.88 MMBtu/hr)	PM/PM_{10}	0.32 lb/hr and 0.005 gr/dscf	Rule 335-3-14-.04 (PSD/BACT)
S15	CHDGL 1 Cleaning Section w/ Mist Eliminator and Dryer (1.88 MMBtu/hr)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S19	CHDGL Annealing Furnace 1 (110 MMBtu/hr)	PM/PM_{10}	0.84 lb/hr and 0.0076 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S19	CHDGL Annealing Furnace 1 (110 MMBtu/hr)	NO_x	6.6 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S19	CHDGL Annealing Furnace 1 (110 MMBtu/hr)	SO_2	0.066 lb/hr and 0.0006 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S19	CHDGL Annealing Furnace 1 (110 MMBtu/hr)	CO	6.6 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S19	CHDGL Annealing Furnace 1 (110 MMBtu/hr)	VOC	0.605 lb/hr and 0.0055 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S19	CHDGL Annealing Furnace 1 (110 MMBtu/hr)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S27	CHDGL 1 Skin Pass Mill and Dryer (1.88 MMBtu/hr) w/ Mist Eliminator	PM/PM10	0.34 lb/hr and 0.0025 gr/dscf	Rule 335-3-14-.04 (PSD/BACT)
S27	CHDGL 1 Skin Pass Mill and Dryer (1.88 MMBtu/hr) w/ Mist Eliminator	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S31	CHDGL 1 Post-Dryer (9.22 MMBtu/hr)	PM/PM10	0.058 lb/hr and	Rule 335-3-14-.04 (PSD/BACT)

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			0.0076 lb/MMBtu	
S31	CHDGL 1 Post-Dryer (9.22 MMBtu/hr)	NO_x	0.46 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S31	CHDGL 1 Post-Dryer (9.22 MMBtu/hr)	SO_2	0.0046 lb/hr and 0.0006 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S31	CHDGL 1 Post-Dryer (9.22 MMBtu/hr)	CO	0.46 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S31	CHDGL 1 Post-Dryer (9.22 MMBtu/hr)	VOC	0.04 lb/hr and 0.0055 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S31	CHDGL 1 Post-Dryer (9.22 MMBtu/hr)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)

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Provisos for Continuous Hot Dip Galvanizing Line 1

Federally Enforceable Provisos		Regulations
Applicability		
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (PSD/BACT)
3.	The Annealing Furnace (S19) and Line 1 Dryer (S15) are subject to the applicable requirements of 40 CFR Part 63, Subpart DDDDD, "*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*".	40 CFR §63.7485 Rule 335-3-11-.06(108)
4.	The Annealing Furnace (S19) and Line 1 Dryer (S15) are subject to the applicable requirements of 40 CFR Part 63, Subpart A, "*General Provisions*", as provided in Table 10 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7565 Rule 335-3-11-.06(1)
5.	The CHDGL 1 Skin Pass Mill and Dryer (S27) is subject to the applicable requirements of 40 CFR Part 64, "*Compliance Assurance Monitoring*", as described in General Proviso No. 33.	40 CFR §64.2
Emission Standards		
1.	Particulate Matter (PM/PM_{10}) emissions from the CHDGL 1 Cleaning Section w/ Mist Eliminator and Dryer (S15) shall not exceed 0.32 lb/hr and 0.005 gr/dscf.	Rule 335-3-14-.04 (PSD/BACT)
2.	Nitrogen Oxide (NOx) emissions from the CHDGL Annealing Furnace #1 (S19) shall not exceed 6.6 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
3.	Carbon Monoxide (CO) emissions from the CHDGL Annealing Furnace #1 (S19) shall not exceed 6.6 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
4.	Volatile Organic Compound (VOC) emissions from the CHDGL Annealing Furnace #1 (S19) shall not exceed 0.605 lb/hr and 0.0055 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
5.	Particulate Matter (PM/PM_{10}) emissions from the CHDGL Annealing Furnace #1 (S19) shall not exceed 0.84 lb/hr and 0.0076 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)

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	Federally Enforceable Provisos	Regulations
6.	Sulfur Dioxide (SO_2) emissions from the CHDGL Annealing Furnace #1 (S19) shall not exceed 0.066 lb/hr and 0.0006 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
7.	Particulate Matter (PM/PM_{10}) emissions from the CHDGL 1 Skin Pass Mill and Dryer w/ Mist Eliminator (S27) shall not exceed 0.34 lb/hr and 0.0025 gr/dscf.	Rule 335-3-14-.04 (PSD/BACT)
8.	Nitrogen Oxide (NOx) emissions from the CHDGL 1 Post-Dryer (S31) shall not exceed 0.46 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
9.	Carbon Monoxide (CO) emissions from the CHDGL 1 Post-Dryer (S31) shall not exceed 0.46 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
10.	Volatile Organic Compound (VOC) emissions from the CHDGL 1 Post-Dryer (S31) shall not exceed 0.04 lb/hr and 0.0055 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
11.	Particulate Matter (PM/PM_{10}) emissions from the CHDGL 1 Post-Dryer (S31) shall not exceed 0.058 lb/hr and 0.0076 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
12.	Sulfur Dioxide (SO_2) emissions from the CHDGL 1 Post-Dryer (S31) shall not exceed 0.0046 lb/hr and 0.0006 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
13.	The opacity of emissions from these sources shall not exceed that designated as 10% opacity as determined by a six-minute average.	Rule 335-3-14-.04 (PSD/BACT)
14.	These units shall fire only natural gas as fuel.	Rule 335-3-14-.04 (PSD/BACT)
15.	Annealing Furnace 1 (S19) and the Line 1 Dryer (S15) are subject to the Work Practice Standards in §63.7500 and Table 3 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7500
Compliance and Performance Test Methods and Procedures		
1.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
2.	Method 6 or 6C of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
3.	Method 7E of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05
4.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05

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Federally Enforceable Provisos	Regulations
5. Method 10 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of carbon monoxide.	Rule 335-3-1-.05
6. Method 18 or 25a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of VOC emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. Reference Appendix C for the monitoring requirements for 40 CFR Part 64, "*Compliance Assurance Monitoring*".	40 CFR §64.7
2. The facility shall conduct a tune-up of the CHDGL Annealing Furnace 1 (S19) annually and the Line 1 Dryer (S15) biennially to demonstrate continuous compliance. The following activities shall be performed:	40 CFR §63.7540(a)(10) 40 CFR §63.7540(a)(11)
(a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months.	
(b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.	
(c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.	
(d) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.	
(e) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).	
(f) Maintain on-site and submit, if requested by the Department, an annual report containing the following information:	
i. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler.	

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Federally Enforceable Provisos	Regulations
ii. A description of any corrective actions taken as a part of the combustion adjustment.	
iii. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.	
If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.	40 CFR §63.7540(a)(13)
3. The facility shall maintain the pressure differential across the Mist Eliminator System (S15) associated with the Line 1 Cleaning Section and Dryer between 0.5 and 1.5 bar and shall monitor and record the pressure differential at least once per shift. Corrective action must be performed within (2) two hours if the pressure differential falls out of the range established by the facility.	Rule 335-3-16-.05(c)
4. The Permittee shall perform a visual check, at least once per day, of the stacks associated with each unit. This check shall be performed by a person familiar with Method 9. At any time, if any visible emissions are noted and are not corrected within a period of one hour, then a Method 9 observation must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed.	Rule 335-3-16-.05(c)
5. NOx emissions tests are to be conducted on the CHDGL Annealing Furnace 1 (S19) at intervals not to exceed 2½ years following the date of the most recent compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)
2. The Permittee shall fulfill all applicable notification, reporting and recordkeeping requirements outlined in 40 CFR §§63.7545, 63.7550 and 63.7555.	40 CFR §63.7545 40 CFR §63.7550 40 CFR §63.7555

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Summary Page for Continuous Hot Dip Galvanizing Line 2

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S16	CHDGL 2 Cleaning Section w/ Mist Eliminator and Dryer (1.88 MMBtu/hr)	PM/PM10	0.32 lb/hr and 0.005 gr/dscf	Rule 335-3-14-.04 (PSD/BACT)
S16	CHDGL 2 Cleaning Section w/ Mist Eliminator and Dryer (1.88 MMBtu/hr)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S20	CHDGL Annealing Furnace 2 (123.8 MMBtu/hr)	PM/PM10	0.94 lb/hr and 0.0076 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S20	CHDGL Annealing Furnace 2 (123.8 MMBtu/hr)	NO_x	7.43 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S20	CHDGL Annealing Furnace 2 (123.8 MMBtu/hr)	SO_2	0.074 lb/hr and 0.0006 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S20	CHDGL Annealing Furnace 2 (123.8 MMBtu/hr)	CO	7.43 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S20	CHDGL Annealing Furnace 2 (123.8 MMBtu/hr)	VOC	0.68 lb/hr and 0.0055 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S20	CHDGL Annealing Furnace 2 (123.8 MMBtu/hr)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S28	CHDGL 2 Skin Pass Mill and Dryer (1.88 MMBtu/hr) w/ Mist Eliminator	PM/PM10	0.34 lb/hr and 0.0025 gr/dscf	Rule 335-3-14-.04 (PSD/BACT)
S28	CHDGL 2 Skin Pass Mill and Dryer (1.88 MMBtu/hr) w/ Mist Eliminator	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)

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Provisos for Continuous Hot Dip Galvanizing Line 2

Federally Enforceable Provisos		Regulations
Applicability		
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (PSD/BACT)
3.	The Annealing Furnace (S20) and Line 2 Dryer (S16) are subject to the applicable requirements of 40 CFR Part 63, Subpart DDDDD, "*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*".	40 CFR §63.7485 Rule 335-3-11-.06(108)
4.	The Annealing Furnace (S20) and Line 2 Dryer (S16) are subject to the applicable requirements of 40 CFR Part 63, Subpart A, "*General Provisions*", as provided in Table 10 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7565 Rule 335-3-11-.06(1)
5.	The CHDGL 2 Skin Pass Mill and Dryer (S28) is subject to the applicable requirements of 40 CFR Part 64, "*Compliance Assurance Monitoring*", as described in General Proviso No. 33.	40 CFR §64.2
Emission Standards		
1.	Particulate Matter (PM/PM_{10}) emissions from the CHDGL 2 Cleaning Section w/ Mist Eliminator and Dryer (S16) shall not exceed 0.32 lb/hr and 0.005 gr/dscf.	Rule 335-3-14-.04 (PSD/BACT)
2.	Nitrogen Oxide (NOx) emissions from the CHDGL Annealing Furnace #2 (S20) shall not exceed 7.43 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
3.	Carbon Monoxide (CO) emissions from the CHDGL Annealing Furnace #2 (S20) shall not exceed 7.43 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
4.	Volatile Organic Compound (VOC) emissions from the CHDGL Annealing Furnace #2 (S20) shall not exceed 0.68 lb/hr and 0.0055 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
5.	Particulate Matter (PM/PM_{10}) emissions from the CHDGL Annealing Furnace #2 (S20) shall not exceed 0.94 lb/hr and 0.0076 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)

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Federally Enforceable Provisos		Regulations
6.	Sulfur Dioxide (SO_2) emissions from the CHDGL Annealing Furnace #2 (S20) shall not exceed 0.074 lb/hr and 0.0006 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
7.	Particulate Matter (PM/PM_{10}) emissions from the CHDGL 2 Skin Pass Mill and Dryer w/ Mist Eliminator (S28) shall not exceed 0.34 lb/hr and 0.0025 gr/dscf.	Rule 335-3-14-.04 (PSD/BACT)
8.	The opacity of emissions from these sources shall not exceed that designated as 10% opacity as determined by a six-minute average.	Rule 335-3-14-.04 (PSD/BACT)
9.	These units shall fire only natural gas as fuel.	Rule 335-3-14-.04 (PSD/BACT)
10.	Annealing Furnace 2 (S20) and the Line 2 Dryer (S16) are subject to the Work Practice Standards in 40 CFR §63.7500 and Table 3 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7500
Compliance and Performance Test Methods and Procedures		
1.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
2.	Method 6 or 6C of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
3.	Method 7E of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05
4.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
5.	Method 10 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of carbon monoxide.	Rule 335-3-1-.05
6.	Method 18 or 25a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of VOC emissions.	Rule 335-3-1-.05
Emission Monitoring		
1.	Reference Appendix C for the monitoring requirements for 40 CFR Part 64, "*Compliance Assurance Monitoring*".	40 CFR §64.7
2.	The facility shall conduct a tune-up of CHDGL Annealing Furnace 2 (S20) annually and the Line 2 Dryer (S16) biennially to demonstrate continuous compliance. The following activities shall be performed:	40 CFR §63.7540(a)(10) 40 CFR §63.7540(a)(11)

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Federally Enforceable Provisos	Regulations
(a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months. (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. (d) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available. (e) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). (f) Maintain on-site and submit, if requested by the Department, an annual report containing the following information: i. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler. ii. A description of any corrective actions taken as a part of the combustion adjustment. iii. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.	40 CFR §63.7540(a)(13)
3. The facility shall maintain the pressure differential across the Mist Eliminator System (S16) associated with the Line 2 Cleaning Section and Dryer between 0.5 and 1.5 bar and shall	Rule 335-3-16-.05(c)

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Federally Enforceable Provisos	Regulations
monitor and record the pressure differential at least once per shift. Corrective action must be performed within (2) two hours if the pressure differential falls out of the range established by the facility. Any repairs or observed problems shall be recorded.	
4. The Permittee shall perform a visual check, at least once per day, of the stacks associated with each unit. This check shall be performed by a person familiar with Method 9. At any time, if any visible emissions are noted and are not corrected within a period of one hour, then a Method 9 observation must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)
5. NOx emissions tests are to be conducted on the CHDGL Annealing Furnace 2 (S20) at intervals not to exceed 2½ years following the date of the most recent compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)
2. The Permittee shall fulfill all applicable notification, reporting and recordkeeping requirements outlined in 40 CFR §§63.7545, 63.7550 and 63.7555.	40 CFR §63.7545 40 CFR §63.7550 40 CFR §63.7555

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Summary Page for Continuous Hot Dip Galvanizing Line 3

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S17	CHDGL 3 Cleaning Section w/ Mist Eliminator and Dryer (1.88 MMBtu/hr)	PM/PM10	0.32 lb/hr and 0.005 gr/dscf	Rule 335-3-14-.04 (PSD/BACT)
S17	CHDGL 3 Cleaning Section w/ Mist Eliminator and Dryer (1.88 MMBtu/hr)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S21	CHDGL Annealing Furnace 3 (110 MMBtu/hr)	PM/PM10	0.84 lb/hr and 0.0076 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S21	CHDGL Annealing Furnace 3 (110 MMBtu/hr)	NO_x	6.6 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S21	CHDGL Annealing Furnace 3 (110 MMBtu/hr)	SO_2	0.066 lb/hr and 0.0006 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S21	CHDGL Annealing Furnace 3 (110 MMBtu/hr)	CO	6.6 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S21	CHDGL Annealing Furnace 3 (110 MMBtu/hr)	VOC	0.605 lb/hr and 0.0055 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S21	CHDGL Annealing Furnace 3 (110 MMBtu/hr)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S29	CHDGL 3 Skin Pass Mill and Dryer (1.88 MMBtu/hr) w/ Mist Eliminator	PM/PM10	0.34 lb/hr and 0.0025 gr/dscf	Rule 335-3-14-.04 (PSD/BACT)
S29	CHDGL 3 Skin Pass Mill and Dryer (1.88 MMBtu/hr) w/ Mist Eliminator	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S33	CHDGL 3 Post-Dryer (9.22 MMBtu/hr)	PM/PM10	0.058 lb/hr and	Rule 335-3-14-.04 (PSD/BACT)

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			0.0076 lb/MMBtu	
S33	CHDGL 3 Post-Dryer (9.22 MMBtu/hr)	NO_x	0.46 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S33	CHDGL 3 Post-Dryer (9.22 MMBtu/hr)	SO_2	0.0046 lb/hr and 0.0006 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S33	CHDGL 3 Post-Dryer (9.22 MMBtu/hr)	CO	0.46 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S33	CHDGL 3 Post-Dryer (9.22 MMBtu/hr)	VOC	0.04 lb/hr and 0.0055 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S33	CHDGL 3 Post-Dryer (9.22 MMBtu/hr)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)

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Provisos for Continuous Hot Dip Galvanizing Line 3

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (PSD/BACT)
3. The Annealing Furnace (S21) and Line 3 Dryer (S17) are subject to the applicable requirements of 40 CFR Part 63, Subpart DDDDD, "*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*".	40 CFR §63.7485 Rule 335-3-11-.06(108)
4. The Annealing Furnace (S21) and Line 3 Dryer (S17) are subject to the applicable requirements of 40 CFR Part 63, Subpart A, "*General Provisions*", as provided in Table 10 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7565 Rule 335-3-11-.06(1)
5. The CHDGL 3 Skin Pass Mill and Dryer (S29) is subject to the applicable requirements of 40 CFR Part 64, "*Compliance Assurance Monitoring*", as described in General Proviso No. 33.	40 CFR §64.2
Emission Standards	
1. Particulate Matter (PM/PM_{10}) emissions from the CHDGL 3 Cleaning Section w/ Mist Eliminator and Dryer (S17) shall not exceed 0.32 lb/hr and 0.005 gr/dscf.	Rule 335-3-14-.04 (PSD/BACT)
2. Nitrogen Oxide (NOx) emissions from the CHDGL Annealing Furnace #3 (S21) shall not exceed 6.6 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
3. Carbon Monoxide (CO) emissions from the CHDGL Annealing Furnace #3 (S21) shall not exceed 6.6 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
4. Volatile Organic Compound (VOC) emissions from the CHDGL Annealing Furnace #3 (S21) shall not exceed 0.605 lb/hr and 0.0055 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
5. Particulate Matter (PM/PM_{10}) emissions from the CHDGL Annealing Furnace #3 (S21) shall not exceed 0.84 lb/hr and 0.0076 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)

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	Federally Enforceable Provisos	Regulations
6.	Sulfur Dioxide (SO_2) emissions from the CHDGL Annealing Furnace #3 (S21) shall not exceed 0.066 lb/hr and 0.0006 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
7.	Particulate Matter (PM/PM_{10}) emissions from the CHDGL 3 Skin Pass Mill and Dryer w/ Mist Eliminator (S29) shall not exceed 0.34 lb/hr and 0.0025 gr/dscf.	Rule 335-3-14-.04 (PSD/BACT)
8.	Nitrogen Oxide (NOx) emissions from the CHDGL 3 Post-Dryer (S33) shall not exceed 0.46 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
9.	Carbon Monoxide (CO) emissions from the CHDGL 3 Post-Dryer (S33) shall not exceed 0.46 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
10.	Volatile Organic Compound (VOC) emissions from the CHDGL 3 Post-Dryer (S33) shall not exceed 0.04 lb/hr and 0.0055 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
11.	Particulate Matter (PM/PM_{10}) emissions from the CHDGL 3 Post-Dryer (S33) shall not exceed 0.058 lb/hr and 0.0076 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
12.	Sulfur Dioxide (SO_2) emissions from the CHDGL 3 Post-Dryer (S33) shall not exceed 0.0046 lb/hr and 0.0006 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
13.	The opacity of emissions from these sources shall not exceed that designated as 10% opacity as determined by a six-minute average.	Rule 335-3-14-.04 (PSD/BACT)
14.	These units shall fire only natural gas as fuel.	Rule 335-3-14-.04 (PSD/BACT)
15.	Annealing Furnace 3 (S21) and the Line 3 Dryer (S17) are subject to the Work Practice Standards in 40 CFR §63.7500 and Table 3 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7500
Compliance and Performance Test Methods and Procedures		
1.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
2.	Method 6 or 6C of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
3.	Method 7E of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05

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Federally Enforceable Provisos	Regulations
4. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
5. Method 10 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of carbon monoxide.	Rule 335-3-1-.05
6. Method 18 or 25a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of VOC emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. Reference Appendix C for the monitoring requirements for 40 CFR Part 64, "*Compliance Assurance Monitoring*".	40 CFR §64.7
2. The facility shall conduct a tune-up of CHDGL Annealing Furnace 3 (S21) annually and the Line 3 Dryer (S17) biennially to demonstrate continuous compliance. The following activities shall be performed:	40 CFR §63.7540(a)(10) 40 CFR §63.7540(a)(11)
(a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months.	
(b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.	
(c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.	
(d) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.	
(e) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).	
(f) Maintain on-site and submit, if requested by the Department, an annual report containing the following information:	

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Federally Enforceable Provisos	Regulations
i. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler.	
ii. A description of any corrective actions taken as a part of the combustion adjustment.	
iii. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.	
If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.	40 CFR §63.7540(a)(13)
3. The facility shall maintain the pressure differential across the Mist Eliminator System (S17) associated with the Line 3 Cleaning Section and Dryer between 0.5 and 1.5 bar and shall monitor and record the pressure differential at least once per shift. Corrective action must be performed within (2) two hours if the pressure differential falls out of the range established by the facility. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)
4. The Permittee shall perform a visual check, at least once per day, of the stacks associated with this unit. This check shall be performed by a person familiar with Method 9. At any time, if any visible emissions are noted and are not corrected within a period of one hour, then a Method 9 observation must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)
5. NOx emissions tests are to be conducted on the CHDGL Annealing Furnace 3 (S21) at intervals not to exceed 2½ years following the date of the most recent compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)

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	Federally Enforceable Provisos	Regulations
2.	The Permittee shall fulfill all applicable notification, reporting and recordkeeping requirements outlined in 40 CFR §§63.7545, 63.7550 and 63.7555.	40 CFR §63.7545 40 CFR §63.7550 40 CFR §63.7555

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Summary Page for Continuous Hot Dip Galvanizing Line 4

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S22	CHDGL Annealing Furnace 4 • 24 MMBtu/hr – Indirect Fired w/ Exhaust Gas Recirculation and Ultra-Low NO_X Burners • 101.68 MMBtu/hr –Direct Fired w/ Low NO_X Burners	PM/PM10	0.912 lb/hr and 0.0076 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S22	CHDGL Annealing Furnace 4 • 24 MMBtu/hr – Indirect Fired w/ Exhaust Gas Recirculation and Ultra-Low NO_X Burners • 101.68 MMBtu/hr –Direct Fired w/ Low NO_X Burners	NO_x	7.2 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S22	CHDGL Annealing Furnace 4 • 24 MMBtu/hr – Indirect Fired w/ Exhaust Gas Recirculation and Ultra-Low NO_X Burners • 101.68 MMBtu/hr –Direct Fired w/ Low NO_X Burners	SO_2	0.072 lb/hr and 0.0006 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S22	CHDGL Annealing Furnace 4 • 24 MMBtu/hr – Indirect Fired w/ Exhaust Gas Recirculation and Ultra-Low NO_X Burners • 101.68 MMBtu/hr –Direct Fired w/ Low NO_X Burners	CO	7.2 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S22	CHDGL Annealing Furnace 4 • 24 MMBtu/hr – Indirect Fired w/ Exhaust Gas Recirculation and Ultra-Low NO_X Burners • 101.68 MMBtu/hr –Direct Fired w/ Low NO_X Burners	VOC	0.66 lb/hr and 0.0055 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S22	CHDGL Annealing Furnace 4 • 24 MMBtu/hr – Indirect Fired w/ Exhaust Gas Recirculation and Ultra-Low NO_X Burners • 101.68 MMBtu/hr –Direct Fired w/ Low NO_X Burners	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S30	CHDGL 4 Skin Pass Mill w/ Mist Eliminator	PM/PM10	0.36 lb/hr and	Rule 335-3-14-.04 (PSD/BACT)

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			0.0025 gr/dscf	
S30	CHDGL 4 Skin Pass Mill w/ Mist Eliminator	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S34	CHDGL 4 Dryer (1.88 MMBtu/hr) and Post-Dryer (9.22 MMBtu/hr)	PM/PM10	0.082 lb/hr and 0.0076 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S34	CHDGL 4 Dryer (1.88 MMBtu/hr) and Post-Dryer (9.22 MMBtu/hr)	NO_x	0.65 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S34	CHDGL 4 Dryer (1.88 MMBtu/hr) and Post-Dryer (9.22 MMBtu/hr)	SO_2	0.0065 lb/hr and 0.0006 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S34	CHDGL 4 Dryer (1.88 MMBtu/hr) and Post-Dryer (9.22 MMBtu/hr)	CO	0.65 lb/hr and 0.06 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S34	CHDGL 4 Dryer (1.88 MMBtu/hr) and Post-Dryer (9.22 MMBtu/hr)	VOC	0.059 lb/hr and 0.0055 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S34	CHDGL 4 Dryer (1.88 MMBtu/hr) and Post-Dryer (9.22 MMBtu/hr)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)

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Provisos for Continuous Hot Dip Galvanizing Line 4

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (PSD/BACT)
3. The Annealing Furnace (S22) is subject to the applicable requirements of 40 CFR Part 63, Subpart DDDDD, "*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*".	40 CFR §63.7485 Rule 335-3-11-.06(108)
4. The Annealing Furnace (S22) is subject to the applicable requirements of 40 CFR Part 63, Subpart A, "*General Provisions*", as provided in Table 10 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7565 Rule 335-3-11-.06(1)
5. The CHDGL 4 Skin Pass Mill and Dryer (S30) is subject to the applicable requirements of 40 CFR Part 64, "*Compliance Assurance Monitoring*", as described in General Proviso No. 33.	40 CFR §64.2
Emission Standards	
1. Nitrogen Oxide (NOx) emissions from the CHDGL Annealing Furnace #4 (S22) shall not exceed 7.2 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
2. Carbon Monoxide (CO) emissions from the CHDGL Annealing Furnace #4 (S22) shall not exceed 7.2 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
3. Volatile Organic Compound (VOC) emissions from the CHDGL Annealing Furnace #4 (S22) shall not exceed 0.66 lb/hr and 0.0055 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
4. Particulate Matter (PM/PM_{10}) emissions from the CHDGL Annealing Furnace #4 (S22) shall not exceed 0.912 lb/hr and 0.0076 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
5. Sulfur Dioxide (SO_2) emissions from the CHDGL Annealing Furnace #4 (S22) shall not exceed 0.072 lb/hr and 0.0006 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)

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	Federally Enforceable Provisos	Regulations
6.	Particulate Matter (PM/PM_{10}) emissions from the CHDGL 4 Skin Pass Mill w/ Mist Eliminator (S30) shall not exceed 0.36 lb/hr and 0.0025 gr/dscf.	Rule 335-3-14-.04 (PSD/BACT)
7.	Nitrogen Oxide (NOx) emissions from the CHDGL 4 Dryer and Post-Dryer (S34) shall not exceed 0.65 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
8.	Carbon Monoxide (CO) emissions from the CHDGL 4 Dryer and Post-Dryer (S34) shall not exceed 0.65 lb/hr and 0.06 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
9.	Volatile Organic Compound (VOC) emissions from the CHDGL 4 Dryer and Post-Dryer (S34) shall not exceed 0.059 lb/hr and 0.0055 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
10.	Particulate Matter (PM/PM_{10}) emissions from the CHDGL 4 Dryer and Dryer and Post-Dryer (S34) shall not exceed 0.082 lb/hr and 0.0076 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
11.	Sulfur Dioxide (SO_2) emissions from the CHDGL 4 Dryer and Post-Dryer (S34) shall not exceed 0.0065 lb/hr and 0.0006 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
12.	The opacity of emissions from these sources shall not exceed that designated as 10% opacity as determined by a six-minute average.	Rule 335-3-14-.04 (PSD/BACT)
13.	These units shall fire only natural gas as fuel.	Rule 335-3-14-.04 (PSD/BACT)
14.	Annealing Furnace 4 (S22) and the Line 4 Dryer (S18) are subject the Work Practice Standards in 40 CFR §63.7500 and Table 3 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7500
Compliance and Performance Test Methods and Procedures		
1.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
2.	Method 6 or 6C of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
3.	Method 7E of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05
4.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05

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Federally Enforceable Provisos	Regulations
5. Method 10 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of carbon monoxide.	Rule 335-3-1-.05
6. Method 18 or 25a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of VOC emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. Reference Appendix C for the monitoring requirements for 40 CFR Part 64, "*Compliance Assurance Monitoring*".	40 CFR §64.7
2. The facility shall conduct a tune-up of CHDGL Annealing Furnace 4 (S22) annually to demonstrate continuous compliance. The following activities shall be performed:	40 CFR §63.7540(a)(10) 40 CFR §63.7540(a)(11)
(a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months	
(b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available	
(c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly	
(d) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available	
(e) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made); and	
(f) Maintain on-site and submit, if requested by the Department, an annual report containing the following information:	
i. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler.	

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Federally Enforceable Provisos	Regulations
ii. A description of any corrective actions taken as a part of the combustion adjustment.	
iii. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.	
If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.	40 CFR §63.7540(a)(13)
3. The Permittee shall perform a visual check, at least once per day, of the stacks associated with this unit. This check shall be performed by a person familiar with Method 9. At any time, if any visible emissions are noted and are not corrected within a period of one hour, then a Method 9 observation must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)
4. NOx emissions tests are to be conducted on the CHDGL Annealing Furnace 4 (S22) at intervals not to exceed 2½ years following the date of the most recent compliance testing. All test reports must be submitted to the Department within 30 days of completion of testing.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)
2. The Permittee shall fulfill all applicable notification, reporting and recordkeeping requirements outlined in 40 CFR §§63.7545, 63.7550 and 63.7555.	40 CFR §63.7545 40 CFR §63.7550 40 CFR §63.7555

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Summary Page for Natural Gas-Fired Water Heater w/ common Stack (S20-A)

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S20-A	Natural Gas-Fired Water Heater (22.5 MMBtu/hr) w/ common Stack (S20-A)	PM/PM10	0.114 lb/hr and 0.0076 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S20-A	Natural Gas-Fired Water Heater (22.5 MMBtu/hr) w/ common Stack (S20-A)	NO_x	0.53 lb/hr and 0.035 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S20-A	Natural Gas-Fired Water Heater (22.5 MMBtu/hr) w/ common Stack (S20-A)	SO_2	0.009 lb/hr and 0.0006 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S20-A	Natural Gas-Fired Water Heater (22.5 MMBtu/hr) w/ common Stack (S20-A)	CO	0.60 lb/hr and 0.04 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S20-A	Natural Gas-Fired Water Heater (22.5 MMBtu/hr) w/ common Stack (S20-A)	VOC	0.083 lb/hr and 0.0055 lb/MMBtu	Rule 335-3-14-.04 (PSD/BACT)
S20-A	Natural Gas-Fired Water Heater (22.5 MMBtu/hr) w/ common Stack (S20-A)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)

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Provisos for Natural Gas-Fired Water Heater w/ common Stack (S20-A)

Federally Enforceable Provisos		Regulations
Applicability		
1.	This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2.	This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (PSD/BACT)
3.	This source is subject to the applicable requirements of 40 CFR Part 63 Subpart DDDDD, "*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*".	40 CFR §63.7485 Rule 335-3-11-.06(108)
4.	This source is subject to the applicable requirements of 40 CFR Part 63, Subpart A, "*General Provisions*", as provided in Table 10 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7565 Rule 335-3-11-.06(1)
5.	This source is subject to the applicable requirements of 40 CFR Part 60 Subpart Dc, "*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*".	40 CFR §60.40c(a) Rule 335-3-10-.02(2)(c)
Emission Standards		
1.	Nitrogen Oxide (NOx) emissions from the 15 MMBtu/hr Hot Water Heater w/ common Stack (S20-A) shall not exceed 0.53 lb/hr and 0.035 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
2.	Carbon Monoxide (CO) emissions from the 15 MMBtu/hr Hot Water Heater w/ common Stack (S20-A) shall not exceed 0.60 lb/hr and 0.04 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
3.	Volatile Organic Compound (VOC) emissions from the 15 MMBtu/hr Hot Water Heater w/ common Stack (S20-A) shall not exceed 0.083 lb/hr and 0.0055 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
4.	Particulate Matter (PM/PM_{10}) emissions from the 15 MMBtu/hr Hot Water Heater w/ common Stack (S20-A) shall not exceed 0.114 lb/hr and 0.0076 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)
5.	Sulfur Dioxide (SO_2) emissions from the 15 MMBtu/hr Hot Water Heater w/ common Stack (S20-A) shall not exceed 0.009 lb/hr and 0.0006 lb/MMBtu.	Rule 335-3-14-.04 (PSD/BACT)

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Federally Enforceable Provisos		Regulations
6.	The opacity of emissions from this source shall not exceed that designated as 10% opacity as determined by a six-minute average.	Rule 335-3-14-.04 (PSD/BACT)
7.	This unit shall fire only natural gas as fuel.	Rule 335-3-14-.04 (PSD/BACT)
8.	This source is subject to the Work Practice Standards in 40 CFR §63.7500 and Table 3 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7500
Compliance and Performance Test Methods and Procedures		
1.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
2.	Method 6 or 6C of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
3.	Method 7E of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05
4.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
5.	Method 10 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of carbon monoxide.	Rule 335-3-1-.05
6.	Method 18 or 25a of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of VOC emissions.	Rule 335-3-1-.05
Emission Monitoring		
1.	The facility shall conduct a tune-up of the Hot Water Heater w/ common Stack (S20-A) annually to demonstrate continuous compliance. The following activities shall be performed: (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months. (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.	40 CFR §63.7540(a)(10)

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Federally Enforceable Provisos	Regulations
(c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. (d) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available. (e) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). (f) Maintain on-site and submit, if requested by the Department, an annual report containing the following information: i. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler. ii. A description of any corrective actions taken as a part of the combustion adjustment. iii. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.	
If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.	40 CFR §63.7540(a)(13)
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)
2. The facility shall record and maintain records of the amounts of each fuel combusted during each day. The records shall be retained for at least two (2) years from the date of generation and available upon request.	40 CFR §60.48c(g)(1) 40 CFR §60.48c(i)

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	Federally Enforceable Provisos	Regulations
3.	The Permittee shall fulfill all applicable notification, reporting and recordkeeping requirements outlined in 40 CFR §§63.7545, 63.7550 and 63.7555.	40 CFR §63.7545 40 CFR §63.7550 40 CFR §63.7555

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Summary Page for HCl Acid Regeneration Plant (S59 & S60)

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S59	Iron Oxide Bins w/ Bagfilters (S59)	PM/PM10	0.41 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S59	Iron Oxide Bins w/ Bagfilters (S59)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S60	Spray Roaster ARP w/ Scrubbing System (S60)	PM/PM10	1.85 lb/hr	Rule 335-3-14-.04 (PSD/BACT)
S60	Spray Roaster ARP w/ Scrubbing System (S60)	Opacity	10% Opacity	Rule 335-3-14-.04 (PSD/BACT)
S60	Spray Roaster ARP w/ Scrubbing System (S60)	HCl	12 ppmv	40 CFR §63.1158(b)(1)
S60	Spray Roaster ARP w/ Scrubbing System (S60)	Cl_2	6 ppmv	40 CFR §63.1158(b)(2)

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Provisos for HCl Acid Regeneration Plant (S59 & S60)

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-14-.04, "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (PSD/BACT)
3. This source is subject to the applicable requirements of 40 CFR Part 63, Subpart CCC, "*National Emission Standards for Hazardous Air Pollutants for Steel Pickling-HCL Process Facilities and Hydrochloric Acid Regeneration Plants*".	40 CFR §63.1155(a)(2) Rule 335-3-11-.06(54)
4. This source is subject to the applicable requirements of 40 CFR Part 63, Subpart A, *"General Provisions*", as provided in Table 1 to 40 CFR Part 63, Subpart CCC.	40 CFR §63.1155(c) Rule 335-3-11-.06(1)
Emission Standards	
1. Particulate Matter (PM/PM_{10}) emissions from the Iron Oxide Bins w/ Bagfilters (S59) shall not exceed 0.41 lb/hr.	Rule 335-3-14-.04 (PSD/BACT)
2. Particulate Matter (PM/PM_{10}) emissions from the Spray Roaster ARP w/ Scrubbing System (S60) shall not exceed 1.85 lb/hr.	Rule 335-3-14-.04 (PSD/BACT)
3. The opacity of emissions from these sources shall not exceed that designated as 10% opacity as determined by a six-minute average.	Rule 335-3-14-.04 (PSD/BACT)
4. The owner or operator shall not cause or allow to be discharged into the atmosphere from a hydrochloric acid regeneration plant: (a) Any gases that contain HCl in concentration in excess of 12 ppmv; and (b) Any gases that contain CL_2 in a concentration in excess of 6 ppmv.	40 CFR §63.1158(b)
5. The owner or operator must operate the plant at all time 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.	40 CFR §63.1159(a)

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Federally Enforceable Provisos	Regulations
6. The owner or operator 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.	40 CFR §63.1159(b)
Compliance and Performance Test Methods and Procedures	
1. Compliance with the HCl and Cl_2 limit will be determined by conducting emission tests in accordance with the procedures detailed in 40 CFR §63.1161(a)-(d).	40 CFR §63.1161
2. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
3. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
4. Method 201 of 40 CFR Part 51 (latest edition), Appendix M shall be used to speciate between particulate matter emissions greater than and less than or equal to 10 microns in diameter.	Rule 335-3-1-.05
5. Method 202 of 40 CFR Part 51 (latest edition), Appendix M shall be used in the determination of condensable particulate matter emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. The Permittee shall prepare an operation and maintenance plan for the hydrochloric acid regeneration plant according to the requirements in 40 CFR §63.1160(b)(2). The plan must be consistent with good maintenance practices and at a minimum require: (a) Performance of the manufacturer's recommended maintenance at the recommended intervals on all required systems and components. (b) Initiation of procedures for appropriate and timely repair, replacement or other corrective action within one (1) working day of detection. (c) Maintenance of a daily record, signed by a responsible maintenance official, showing the date of each inspection for each requirement, the problems found, a description of the repair, replacement, or other action taken, and the date of repair or replacement.	40 CFR §63.1160(b)(2)

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Federally Enforceable Provisos		Regulations
2.	The Permittee shall adhere to the monitoring requirements detailed in 40 CFR §63.1162(a)((1),(2),(4),(5),(6)), (b), & (c).	40 CFR §63.1162
3.	The Permittee shall perform a visual check, at least once per day, of the stacks associated with each unit. These checks shall be performed by a person familiar with Method 9. At any time, if any visible emissions are noted and are not corrected within a period of 1 hour, then a Method 9 observation must be performed within 4 hours of the observations. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)
4.	The Permittee shall maintain the pressure differential across the Spray Roaster ARP Scrubbing System (S60) between 350 and 1,400 mm H_2O and shall monitor and record the pressure differential at least once per shift. Corrective action must be performed within (2) two hours if the pressure differential falls out of the range established by the facility. Any repairs or observed problems shall be recorded.	40 CFR §63.1162(a)(6) Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements		
1.	The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)
2.	The Permittee shall maintain a record of the Spray Roaster ARP Scrubbing System (S60) pressure differential monitoring required under this Permit. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-16-.05(c)
3.	Concerning the hydrochloric acid regeneration plant, the facility shall adhere to the recordkeeping and reporting requirements detailed in 40 CFR §63.1164(a), (b), & (c) and 40 CFR §63.1165(a), (b), & (c).	40 CFR §63.1164 40 CFR §63.1165

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Summary Page for Nickel Flash System (S62)

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S62	Nickel Flash System with Tank Farm & Scrubber (S62)	-	Operating Standards – see provisions	40 CFR §63.1159

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Provisos for Nickel Flash System (S62)

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. The HCl storage vessels associated with this source are subject to the applicable requirements of 40 CFR Part 63 Subpart CCC, "*National Emission Standards for Hazardous Air Pollutants for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants*".	40 CFR §63.1155(a)(1) Rule 335-3-11-.06(54)
3. The HCl storage vessels associated with this source are subject to the applicable requirements of 40 CFR Part 63, Subpart A, *"General Provisions*", as provided in Table 1 to 40 CFR Part 63, Subpart CCC.	40 CFR §63.1155(c) Rule 335-3-11-.06(1)
Emission Standards	
1. The Permittee 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.	40 CFR §63.1159(b)
2. The Permittee must, at all times, operate and maintain any affected source subject to the requirements of this subpart, including associated air pollution control equipment and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the owner or operator to make any further efforts to reduce emissions if levels required by this standard have been achieved.	40 CFR §63.1159(c)
3. The opacity of emissions from this source shall not exceed the standards specified in General Proviso No. 29.	Rule 335-3-4-.01(1)
Compliance and Performance Test Methods and Procedures	
1. Method 26A of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of HCl emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. The Permittee shall inspect each vessel semiannually to determine that the closed-vent system and either the air	40 CFR §63.1162(a)

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Federally Enforceable Provisos	Regulations
pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.	
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of the semiannual inspection of the closed-vent system and any malfunction and corrective action needed for air pollution control equipment. These records shall be kept for a period of five (5) years.	40 CFR §63.1165
2. The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)

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Summary Page for Batch Annealing Furnace (S63-A & S63-B)

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
S63-A & S63-B	70.68 MMBtu/hr Batch Annealing Furnace with Low NO_X Burners & Waste Heat Recovery (S63-A & S63-B)	-	Natural Gas Usage <323 Mft^3/12-months	Rule 335-3-14-.04 (Anti-PSD)
S63-A & S63-B	70.68 MMBtu/hr Batch Annealing Furnace with Low NO_X Burners & Waste Heat Recovery (S63-A & S63-B)	PM	0.21 lb/MMBtu	Rule 335-3-4-.03(1)
S63-A & S63-B	70.68 MMBtu/hr Batch Annealing Furnace with Low NO_X Burners & Waste Heat Recovery (S63-A & S63-B)	SO_2	1.8 lb/MMBtu	Rule 335-3-5-.01(1)(b)
S63-A & S63-B	70.68 MMBtu/hr Batch Annealing Furnace with Low NO_X Burners & Waste Heat Recovery (S63-A & S63-B)	Opacity	(See General Proviso 29)	Rule 335-3-4-.01(1)

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Provisos for Batch Annealing Furnace (S63-A & S63-B)

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. This source is subject to the applicable requirements of ADEM Admin Code r. 335-3-4-.01, "*Control of Particulate Emissions – Visible Emissions*".	Rule 335-3-4-.01
3. This source is subject to the applicable requirements of ADEM Admin Code r. 335-3-4-.03, "*Control of Particulate Emissions – Fuel Burning Equipment*".	Rule 335-3-4-.03
4. This source is subject to the applicable requirements of ADEM Admin Code r. 335-3-5-.01, "*Control of Sulfur Compound Emissions – Fuel Combustion*".	Rule 335-3-5-.01
5. This source has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 "*Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration Permitting (PSD)]*".	Rule 335-3-14-.04 (Anti-PSD)
6. This source is subject to the applicable requirements of 40 CFR Part 63, Subpart DDDDD, "*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*".	40 CFR §63.7485 Rule 335-3-11-.06(108)
7. This source is subject to the applicable requirements of 40 CFR Part 63, Subpart A, "*General Provisions*", as provided in Table 10 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7565 Rule 335-3-11-.06(1)
8. This source is subject to the applicable requirements of 40 CFR Part 60, Subpart Dc, "*Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*".	40 CFR §60.40c(a) Rule 335-3-10-.02(2)(c)
Emission Standards	
1. Natural Gas usage for this source shall not exceed 323,000,000 cubic feet during any consecutive twelve (12) month period.	Rule 335-3-14-.04 (Anti-PSD)
2. Particulate Matter (PM/PM_{10}) emissions from this source shall not exceed 0.21 lb/MMBtu.	Rule 335-3-4-.03(1)

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Federally Enforceable Provisos	Regulations
3. Sulfur Dioxide (SO_2) emissions from this source shall not exceed 1.8 lb/MMBtu.	Rule 335-3-5-.01(1)(b)
4. The opacity of emissions from this source shall not exceed the standards specified in General Proviso No. 29.	Rule 335-3-4-.01(1)
5. This source is subject to the Work Practice Standards in 40 CFR §63.7500 and Table 3 to 40 CFR Part 63, Subpart DDDDD.	40 CFR §63.7500
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of filterable particulate matter emissions.	Rule 335-3-1-.05
2. Method 6 or 6C of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
3. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
Emission Monitoring	
1. The facility shall conduct a tune-up of the Batch Annealing Furnace annually to demonstrate continuous compliance. The following activities shall be performed: (a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months. (b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. (d) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.	40 CFR §63.7540(a)(10)

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Federally Enforceable Provisos	Regulations
(e) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).	
(f) Maintain on-site and submit, if requested by the Department, an annual report containing the following information. i. The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler. ii. A description of any corrective actions taken as a part of the combustion adjustment. iii. The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.	
If a process heater is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.	Rule 335-3-16-.05(c)
2. The Permittee shall perform a visual check, at least once per day, of the stacks associated with this unit. This check shall be performed by a person familiar with Method 9. At any time, if any visible emissions are noted and are not corrected within a period of one hour, then a Method 9 observation must be performed within 4 hours of the initial observation. Maintenance shall be performed as needed. Any repairs or observed problems shall be recorded.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements	
1. Records of monthly and twelve (12) month rolling totals of natural gas usage for this source shall be maintained in a form suitable for inspection for a period of five (5) years from the date the natural gas is consumed.	Rule 335-3-16-.05(c)

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	Federally Enforceable Provisos	Regulations
2.	The Permittee shall maintain a record of all monitoring required by this permit. This shall include all problems observed and any corrective action taken. The records shall be maintained in a form suitable for inspection and shall be kept on site for a period of five (5) years.	Rule 335-3-16-.05(c)
3.	The Permittee shall record and maintain records of the amounts of each fuel combusted during each day. The records shall be retained for at least two (2) years from the date of generation and available upon request.	40 CFR §60.48c(i)
4.	The Permittee shall fulfill all applicable notification, reporting and recordkeeping requirements outlined in 40 CFR §§63.7545, 63.7550 and 63.7555.	40 CFR §63.7545 40 CFR §63.7550 40 CFR §63.7555

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Summary Page for NSPS IIII Emergency Generators (Appendix A)

Permitted Operating Schedule: Hrs/day x Days/week x Weeks/yr = 500 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
SXX-1	Fueling Station Pump	NMHC+NO_X	5.6 g/HP-hr	Subpart IIII Table 2
SXX-1	Fueling Station Pump	CO	4.1 g/HP-hr	Subpart IIII Table 2
SXX-1	Fueling Station Pump	PM	0.22 g/HP-hr	Subpart IIII Table 2
S42 S47 – S49 S50 – S52 S55 S57 SXX-8	Building 901 Generator Primary Diesel Pumps 1 – 3 Secondary Diesel Pumps 1 – 3 Cooling Water Generator Administrative Building Generator S4 Pump	NMHC+NO_X	2.98 g/HP-hr	§89.112, Table 1 §60.4202(a)(2) §60.4205(b)
S43 – S46 S53 – S54 S56 S58	Electrical Room Generators 2-1 – 4 Generator Line 1 & 4 Permanent Data Center Generator Dispatch Center Generator	NMHC+NO_X	4.77 g/HP-hr	§89.112, Table 1 §60.4202(a)(2) §60.4205(b)
S42 S43 – S46 S47 – S49 S50 – S52 S53 – S54 S55 S56 S57 S58 SXX-8	Building 901 Generator Electrical Room Generators 2-1 – 4 Primary Diesel Pumps 1 – 3 Secondary Diesel Pumps 1 – 3 Generator Line 1 & 4 Cooling Water Generator Permanent Data Center Generator Administrative Building Generator Dispatch Center Generator S4 Pump	CO	2.61 g/HP-hr	§89.112, Table 1 §60.4202(a)(2) §60.4205(b)
S42 S43 – S46 S47 – S49 S50 – S52 S53 – S54 S55 S56 S57 S58 SXX-8	Building 901 Generator Electrical Room Generators 2-1 – 4 Primary Diesel Pumps 1 – 3 Secondary Diesel Pumps 1 – 3 Generator Line 1 & 4 Cooling Water Generator Permanent Data Center Generator Administrative Building Generator Dispatch Center Generator S4 Pump	PM	0.15 g/HP-hr	§89.112, Table 1 §60.4202(a)(2) §60.4205(b)
SXX-4 & SXX-5	Pump House 1 & 2	NMHC+NO_X	3.0 g/HP-hr	Subpart IIII Table 4
SXX-4 & SXX-5	Pump House 1 & 2	PM	0.15 g/HP-hr	Subpart IIII Table 4
See Appendix A	Emergency Generators (Appendix A)	Opacity	(See Emission Standards Proviso 4)	§60.4205(b) §60.4202(a)
See Appendix A	Emergency Generators (Appendix A)	Opacity	(See General Proviso 29)	Rule 335-3-4-.01(1)

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Provisos for NSPS IIII Emergency Generators (Appendix A)

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.01, "*Control of Particulate Emissions – Visible Emissions*".	Rule 335-3-4-.01
3. These sources are subject to the applicable requirements of 40 CFR Part 60, Subpart IIII, "*Standards of Performance for Compression Ignition Internal Combustion Engines*".	40 CFR §60.4200(a)(2) Rule 335-3-10-.02(87)
4. These sources are subject to the applicable requirements of 40 CFR Part 60, Subpart A, "*General Provisions*" as provided in Table 8 to 40 CFR Part 60, Subpart IIII.	40 CFR §60.4218 Rule 335-3-10-.02(1)
Emission Standards	
1. Engines S42 – S58 are subject to the following emission standards listed in Table 1 of §89.112 per §60.4202(a)(2) via §60.4205(b).	40 CFR §60.4205(b)
(a) Non-Methane Hydrocarbon plus Nitrogen Oxide (NMHC+NOx) emissions from the listed engines, except S43 – S46, S53 – S54, S56, and S58, shall not exceed 4.0 g/kW-hr or 2.98 g/HP-hr.	
(b) Non-Methane Hydrocarbon plus Nitrogen Oxide (NMHC+NOx) emissions from engines S43 – S46, S53 – S54, S56, and S58 shall not exceed 6.4 g/kW-hr or 4.77 g/HP-hr.	
(c) Carbon Monoxide (CO) emissions from the listed engines shall not exceed 3.5 g/kW-hr or 2.61 g/HP-hr.	
(d) Particulate Matter (PM) emissions from the listed engines shall not exceed 0.20 g/kW-hr or 0.15 g/HP-hr	
2. Engine SXX-1 is subject to applicable requirements listed in §1039.115 as well as the following emission standards listed in Table 2 of 40 CFR Part 60, Subpart IIII per §60.4202(a)(1) via §60.4205(b).	40 CFR §60.4205(b)

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Federally Enforceable Provisos	Regulations
(a) Non-Methane Hydrocarbon plus Nitrogen Oxide (NMHC+NOx) emissions from engine SXX-1 shall not exceed 7.5 g/kW-hr or 5.6 g/HP-hr.	
(b) Carbon Monoxide (CO) emissions from engine SXX-1 shall not exceed 5.5 g/kW-hr or 4.1 g/HP-hr.	
(c) Particulate Matter (PM) emissions from engine SXX-1 shall not exceed 0.30 g/kW-hr or 0.22 g/HP-hr	
3. Fire Pump engines SXX-4 & SXX-5 are subject to the following emission standards listed in Table 4 of 40 CFR Part 60, Subpart IIII per §60.4205(c).	40 CFR §60.4205(c)
(a) Non-Methane Hydrocarbon plus Nitrogen Oxide (NMHC+NOx) emissions from the listed engines shall not exceed 4.0 g/kW-hr or 3.0 g/HP-hr.	
(b) Particulate Matter (PM) emissions from the listed engines shall not exceed 0.2 g/kW-hr or 0.15 g/HP-hr.	
4. In addition to the opacity standards of General Permit Proviso 29, emissions from the engines, except fire pump engines SXX-4 & SXX-5, may not exceed opacity of:	40 CFR §60.4205(b) 40 CFR §60.4202(a)
(a) 20 percent during acceleration mode.	40 CFR §89.113(a)(1) 40 CFR §1039.105(b)(1)
(b) 15 percent during lugging mode.	40 CFR §89.113(a)(2) 40 CFR §1039.105(b)(2)
(c) 50 percent during peaks in either acceleration or lugging modes.	40 CFR §89.113(a)(3) 40 CFR §1039.105(b)(3)
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
2. Method 25A of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of hydrocarbon emissions.	Rule 335-3-1-.05
3. Method 7e of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05
4. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of compliance with the opacity requirements of General Permit Proviso 29.	Rule 335-3-1-.05

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Federally Enforceable Provisos	Regulations
5. The procedures of 40 CFR Part 86, Subpart I shall be used in the determination of compliance with the opacity requirements of Emission Standards Proviso 4 of this section.	40 CFR §89.113(b) 40 CFR §1039.105(b)
6. Method 10 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of carbon monoxide emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. The engines must be certified according to 40 CFR Part 60, Subpart IIII for the same model year and maximum engine power.	40 CFR §60.4205(b) 40 CFR §60.4211(c)
2. These engines must be installed and configured according to the manufacturer's specifications.	40 CFR §60.4211(a)
3. The facility must operate and maintain these units according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.	40 CFR §60.4206
4. These units must use diesel fuel that meets the requirements of 40 CFR §80.510(b).	40 CFR §60.4207(b)
5. The Permittee must install a non-resettable hour meter prior to startup of the engines.	40 CFR §60.4209(a)
6. For each emergency engine, the facility shall meet the following requirements to demonstrate compliance with 40 CFR Part 60 Subpart IIII:	40 CFR §60.4211(f)
(a) The engine may be operated for the purpose of maintenance checks and readiness testing for a period not to exceed 100 hours per year.	40 CFR §60.4211(f)(2)
(b) There is no time limit on the use of the engine in emergency situations.	40 CFR §60.4211(f)(1)
(c) The engine may operate up to 50 hours per year in non-emergency situations.	40 CFR §60.4211(f)(3)
i. The 50 hours for non-emergency situations shall count towards the 100 hours allowed for maintenance checks and readiness.	
ii. The 50 hours for non-emergency situations shall not be used for peak shaving or generating income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.	

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Federally Enforceable Provisos	Regulations
Recordkeeping and Reporting Requirements	
1. The Permittee must keep records of the operation of the engines in service as recorded through the non-resettable hour meter. The time of operation of the each engine must be recorded and maintained for a period of two (2) years.	Rule 335-3-1-.05(c)

Summary Page for NSPS JJJJ Emergency Generators (Appendix B)

Permitted Operating Schedule: Hrs/day x Days/week x Weeks/yr = 500 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
SXX-2 SXX-7	Cold Roll Mill Generator Electric Substation Generator	NMHC+NO_X	10.0 g/HP-hr	§90.103, Table 1 §60.4231(c) §60.4233(c)&(d)
SXX-2 SXX-7	Cold Roll Mill Emergency Generator Electric Substation Generator	CO	387 g/HP-hr	§90.103, Table 1 §60.4231(c) §60.4233(c)&(d)
SXX-3 SXX-6	HSM Furnace Generator Firewater Controls Generator	NO_X	2.0 g/HP-hr 160 ppmvd at 15% O_2	§60.4233(d) Subpart IIII, Table 1
SXX-3 SXX-6	HSM Furnace Generator Firewater Controls Generator	CO	4.0 g/HP-hr 540 ppmvd at 15% O_2	§60.4233(d) Subpart IIII, Table 1
SXX-3 SXX-6	HSM Furnace Generator Firewater Controls Generator	VOC	1.0 g/HP-hr 86 ppmvd at 15% O_2	§60.4233(d) Subpart IIII, Table 1
See Appendix B	Emergency Generators (Appendix B)	Opacity	(See General Proviso 29)	Rule 335-3-4-.01(1)

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Provisos for NSPS JJJJ Emergency Generators (Appendix B)

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "*Major Source Operating Permits*".	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-4-.01, "*Control of Particulate Emissions – Visible Emissions*".	Rule 335-3-4-.01
3. These sources are subject to the applicable requirements of 40 CFR Part 60, Subpart JJJJ, "*Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*".	40 CFR §60.4230(a)(4) Rule 335-3-10-.02(88)
4. These sources are subject to the applicable requirements of 40 CFR Part 60, Subpart A, "*General Provisions*" as provided in Table 3 to 40 CFR Part 60, Subpart JJJJ.	40 CFR §60.4246 Rule 335-3-10-.02(1)
Emission Standards	
1. Engines SXX-3 and SXX-6 are subject to the following emission standards listed in Table 1 of 40 CFR Part 60, Subpart JJJJ per §60.4233(e).	40 CFR §60.4233(e)
(a) Nitrogen Oxide (NOx) emissions from engines shall not exceed 2.0 g/HP-hr or 160 ppmvd at 15% O_2.	
(b) Carbon Monoxide (CO) emissions from engines shall not exceed 4.0 g/HP-hr or 540 ppmvd at 15% O_2.	
(c) Particulate Matter (PM) emissions from engines shall not exceed 1.0 g/HP-hr or 86 ppmvd at 15% O_2.	
2. Engines SXX-3 and SXX-6 are subject to the following emission standards listed in Table 1 of §90.103 per §60.4233(c) and Table 1 of 40 CFR Part 60, Subpart JJJJ per §60.4233(d).	40 CFR §60.4233(c) 40 CFR §60.4233(d)
(a) Non-Methane Hydrocarbon plus Nitrogen Oxide (NMHC+NOx) emissions from the listed engines shall not exceed 10 g/HP-hr.	
(b) Carbon Monoxide (CO) emissions from the listed engines shall not exceed 387 g/HP-hr.	
Compliance and Performance Test Methods and Procedures	

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Federally Enforceable Provisos		Regulations
1.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
2.	Method 6 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
3.	Method 7e of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of nitrogen dioxide emissions.	Rule 335-3-1-.05
4.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
5.	Method 10 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of carbon monoxide emissions.	Rule 335-3-1-.05
Emission Monitoring		
1.	These sources are subject to no additional specific requirements other than those listed in the General Provisos.	N/A
2.	These units must be certified according to 40 CFR Part 60, Subpart JJJJ for the same model year and maximum engine power.	40 CFR §60.4243(a) 40 CFR §60.4243(b)
3.	These units must be installed and configured according to the manufacturer's specifications.	40 CFR §60.4243(a)(1)
4.	The facility must operate and maintain these units according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.	40 CFR §60.4243(a)(1)
5.	The Permittee must install a non-resettable hour meter on each unit.	40 CFR §60.4237
6.	For each emergency engine, the facility shall meet the following requirements to demonstrate compliance with 40 CFR Part 60 Subpart IIII:	40 CFR §60.4243(d)
	(a) The engine may be operated for the purpose of maintenance checks and readiness testing for a period not to exceed 100 hours per year.	40 CFR §60.4243(d)(2)
	(b) There is no time limit on the use of the engine in emergency situations.	40 CFR §60.4243(d)(1)
	(c) The engine may operate up to 50 hours per year in non-emergency situations.	40 CFR §60.4243(d)(3)

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Federally Enforceable Provisos	Regulations
i. The 50 hours for non-emergency situations shall count towards the 100 hours allowed for maintenance checks and readiness.	
ii. The 50 hours for non-emergency situations shall not be used for peak shaving or generating income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.	
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR Part 60, Subpart JJJJ for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The following records shall be kept:	40 CFR §60.4245(a)(1) 40 CFR §60.4245(a)(2) 40 CFR §60.4245(a)(3)
(a) All notifications submitted to comply with Subpart JJJJ and all documentations supporting any notification.	
(b) Maintenance conducted on each unit.	
(c) Documentation from the manufacturer that each engine is certified to meet the emission standards.	
(d) Hours of operation of each unit that is recorded through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.	40 CFR §60.4245(b)

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Appendix A – NSPS IIII Emergency Generators

Emission Point	Location	Capacity (Horsepower)	Installed	Fuel
S42	Building 901	398	2009	Diesel
S43	Electrical Room 2-1	1,502	2009	Diesel
S44	Electrical Room 2-2	1,502	2009	Diesel
S45	Electrical Room 2-3	1,502	2009	Diesel
S46	Electrical Room 4	1,502	2009	Diesel
S47	Primary Diesel Pump 1	717	2009	Diesel
S48	Primary Diesel Pump 2	717	2009	Diesel
S49	Primary Diesel Pump 3	717	2009	Diesel
S50	Secondary Diesel Pump 1	225	2009	Diesel
S51	Secondary Diesel Pump 2	225	2009	Diesel
S52	Secondary Diesel Pump 3	225	2009	Diesel
S53	Diesel Generator - Line 1	1,502	2009	Diesel
S54	Diesel Generator – Line 4	1,502	2009	Diesel
S55	Cooling Towers	532	2009	Diesel
S56	Permanent Data Center	1,073	2010	Diesel
S57	Administrative Building	403	2008	Diesel
S58	Dispatch Center	805	2010	Diesel
SXX-1	Fueling Station	48	2012	Diesel
SXX-4	Pump House 1	542	2009	Diesel
SXX-5	Pump House 2	542	2010	Diesel
SXX-8	S4 Pump	475	2009	Diesel

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Appendix B – NSPS JJJJ Emergency Generators

Emission Point	Location	Capacity (Horsepower)	Installed	Fuel
SXX-2	Cold Roll Mill	27	2013	Propane
SXX-3	HSM Furnace	202	2011	Natural Gas
SXX-6	Controls Firewater	134	2010	Natural Gas
SXX-7	Electrical Substation	94	2011	Natural Gas

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Appendix C – CAM

Compliance Plan for Roughing Mill and Finishing Mill Wet Electrostatic Precipitators (S5a & S5)

	Indicator 1	Indicator 2	Indicator 3
I. Indicator	Secondary Voltage	Inspection/Maintenance	Opacity
Measurement Approach	The WESP secondary voltage will be measured using the WESP controller.	Semi-annual inspections will be conducted and applicable maintenance will be performed according to work practices and procedures.	A visual check for emissions will be performed at least once per day. At any time, if any visible emissions are noted and not corrected within a period of (1) one hour, a visible emissions observation will be performed within 4 hours of the initial visual check.
II. Indicator Range	An excursion is defined as a 3-hr block average below the minimum required secondary voltage for periods where each individual compartment or both compartments together are in operation.	Excursions are defined as both not conducting semi-annual inspections properly and not performing necessary maintenance according to work practices and procedures.	An excursion is defined as the presence of visible emissions greater than 10% opacity. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria A. Data Representative-ness	The voltage will be measured using the instrumentation provided with the WESP.	Inspections will be performed at the WESP.	Visual inspection logs will be maintained and audited to ensure VE readings are conducted. The daily visual check will be performed by a person familiar with EPA Method 9. The visible emission observations will be conducted according to EPA Method 9.
B. Verification of Operation Status	Records of the readings will be maintained.	Not Applicable	Records of the readings will be maintained.
C. QA/QC Practices and Criteria	Controller will develop and implement a periodic performance check system.	Qualified personal will conduct inspections and perform maintenance.	Method 9 reader will be certified, and training records will be maintained.
D. Monitoring Frequency	At least once every 15 minutes	Semi-annual inspections and Preventative maintenance conducted as needed	Daily visual checks and Visible emissions observations as required
E. Data Collection Procedures	The secondary voltage will be recorded with date and time.	Each inspection and maintenance item will be recorded.	Visual inspection logs for each check and observation shall be maintained.
F. Averaging Period	3-hour block average	Not Applicable	6-minute rolling average (every 15 seconds)

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Appendix C – CAM

Compliance Plan for Processor and Stretcher/Leveler with Baghouse (S6 & S7)

	Indicator 1	Indicator 2	Indicator 3
I. Indicator	Differential Pressure	Inspection/Maintenance	Opacity
Measurement Approach	Differential pressure across the baghouse will be measured using a differential pressure change.	Quarterly inspections will be conducted and applicable maintenance will be performed according to work practices and procedures.	A visual check for emissions will be performed at least once per day. At any time, if any visible emissions are noted and not corrected within a period of (1) one hour, a visible emissions observation will be performed within 4 hours of the initial visual check.
II. Indicator Range	The pressure differential shall be maintained within the range between 2.27 and 13.63 bar.	Excursions are defined as both not conducting quarterly inspections properly and not performing necessary maintenance according to work practices and procedures.	An excursion is defined as the presence of visible emissions greater than 10% opacity. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria			
A. Data Representative-ness	The differential pressure will measure the pressure difference between the inlet and outlet of the baghouse.	Inspections will be performed at the baghouse.	Visual inspection logs will be maintained and audited to ensure VE readings are conducted. The daily visual check will be performed by a person familiar with EPA Method 9. The visible emission observations will be conducted according to EPA Method 9.
B. Verification of Operation Status	Records of the readings will be maintained.	Not Applicable	Records of the readings will be maintained.
C. QA/QC Practices and Criteria	The differential pressure gauge will be checked for performance annually.	Qualified personal will conduct inspections and perform maintenance.	Method 9 reader will be certified, and training records will be maintained.
D. Monitoring Frequency	Once per shift.	Quarterly inspections and Preventative maintenance conducted as needed	Daily visual checks and Visible emissions observations as required
E. Data Collection Procedures	The differential pressure will be recorded with date and time.	Each inspection and maintenance item will be recorded.	Visual inspection logs for each check and observation shall be maintained.
F. Averaging Period	Not Applicable	Not Applicable	6-minute rolling average (every 15 seconds)

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Appendix C – CAM

Compliance Plan for Tandem Mill Mist Eliminator (S12)

	Indicator 1	Indicator 2	Indicator 3
I. Indicator	Differential Pressure	Inspection/Maintenance	Opacity
Measurement Approach	Differential pressure across the baghouse will be measured using a differential pressure change.	Quarterly inspections will be conducted and applicable maintenance will be performed according to work practices and procedures.	A visual check for emissions will be performed at least once per day. At any time, if any visible emissions are noted and not corrected within a period of (1) one hour, a visible emissions observation will be performed within 4 hours of the initial visual check.
II. Indicator Range	The pressure differential shall be maintained within the range between 350 and 2,200 mm H_2O.	Excursions are defined as both not conducting quarterly inspections properly and not performing necessary maintenance according to work practices and procedures.	An excursion is defined as the presence of visible emissions greater than 10% opacity. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria A. Data Representative-ness	The differential pressure will measure the pressure difference between the inlet and outlet of the baghouse.	Inspections will be performed at the mist eliminator system.	Visual inspection logs will be maintained and audited to ensure VE readings are conducted. The daily visual check will be performed by a person familiar with EPA Method 9. The visible emission observations will be conducted according to EPA Method 9.
B. Verification of Operation Status	Records of the readings will be maintained.	Not Applicable	Records of the readings will be maintained.
C. QA/QC Practices and Criteria	The differential pressure gauge will be checked for performance annually.	Qualified personal will conduct inspections and perform maintenance.	Method 9 reader will be certified, and training records will be maintained.
D. Monitoring Frequency	Once per shift.	Quarterly inspections and Preventative maintenance conducted as needed	Daily visual checks and Visible emissions observations as required
E. Data Collection Procedures	The differential pressure will be recorded with date and time.	Each inspection and maintenance item will be recorded.	Visual inspection logs for each check and observation shall be maintained.
F. Averaging Period	Not Applicable	Not Applicable	6-minute rolling average (every 15 seconds)

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Appendix C – CAM

Compliance Plan for Continuous Hot Dip Galvanizing Lines 1-4 Skin Pass Mill & Dryer with Mist Eliminator (S27, S28, S29, & S30)

	Indicator 1	Indicator 2
I. Indicator	Inspection/Maintenance	Opacity
Measurement Approach	Semi-annual inspections will be conducted and applicable maintenance will be performed according to work practices and procedures.	A visual check for emissions will be performed at least once per day. At any time, if any visible emissions are noted and not corrected within a period of (1) one hour, a visible emissions observation will be performed within 4 hours of the initial visual check.
II. Indicator Range	Excursions are defined as both not conducting semi-annual inspections properly and not performing necessary maintenance according to work practices and procedures.	An excursion is defined as the presence of visible emissions greater than 10% opacity. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria A. Data Representative-ness	Inspections will be performed at the mist eliminator system.	Visual inspection logs will be maintained and audited to ensure VE readings are conducted. The daily visual check will be performed by a person familiar with EPA Method 9. The visible emission observations will be conducted according to EPA Method 9.
B. Verification of Operation Status	Not Applicable	Records of the readings will be maintained.
C. QA/QC Practices and Criteria	Qualified personal will conduct inspections and perform maintenance.	Method 9 reader will be certified, and training records will be maintained.
D. Monitoring Frequency	Semi-annual inspections and Preventative maintenance conducted as needed	Daily visual checks and Visible emissions observations as required
E. Data Collection Procedures	Each inspection and maintenance item will be recorded.	Visual inspection logs for each check and observation shall be maintained.
F. Averaging Period	Not Applicable	6-minute rolling average (every 15 seconds)

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Appendix C – CAM

Compliance Plan for Skin Pass Mill with Mist Eliminator (S36)

	Indicator 1	Indicator 2
I. Indicator	Inspection/Maintenance	Opacity
Measurement Approach	Semi-annual inspections will be conducted and applicable maintenance will be performed according to work practices and procedures.	A visual check for emissions will be performed at least once per day. At any time, if any visible emissions are noted and not corrected within a period of (1) one hour, a visible emissions observation will be performed within 4 hours of the initial visual check.
II. Indicator Range	Excursions are defined as both not conducting semi-annual inspections properly and not performing necessary maintenance according to work practices and procedures.	An excursion is defined as the presence of visible emissions greater than 10% opacity. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria A. Data Representative-ness	Inspections will be performed at the mist eliminator system.	Visual inspection logs will be maintained and audited to ensure VE readings are conducted. The daily visual check will be performed by a person familiar with EPA Method 9. The visible emission observations will be conducted according to EPA Method 9.
B. Verification of Operation Status	Not Applicable	Records of the readings will be maintained.
C. QA/QC Practices and Criteria	Qualified personal will conduct inspections and perform maintenance.	Method 9 reader will be certified, and training records will be maintained.
D. Monitoring Frequency	Semi-annual inspections and Preventative maintenance conducted as needed	Daily visual checks and Visible emissions observations as required
E. Data Collection Procedures	Each inspection and maintenance item will be recorded.	Visual inspection logs for each check and observation shall be maintained.
F. Averaging Period	Not Applicable	6-minute rolling average (every 15 seconds)

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