COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION SOUTHWEST REGION - FIELD OPERATIONS

AIR QUALITY

400 WATERFRONT DRIVE PITTSBURGH, PENNSYLVANIA 15222-4745

RACT

04-0227

OPERATING PERMIT

In accordance with provisions of the Air Pollution Control Act, the Act of January 8,1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the Rules and Regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination sources(s) described below.

Permit Number: 04-000-227

Owner: Koppel Steel Corporation

Ambridge Plant

Address: P.O. Box 750

Beaver Falls, PA 15010

Attention: Joseph Frank

Environmental Supervisor

Source: Heat Treat Furnaces & Heaters

Air:

Cleaning: Devices:

Location: Harmony Twp

County: Beaver

this permit is subject to the following conditions:

- 1. That the source and any associated air cleaning devices are to be:
 - a. Operated in such a manner as not to cause air pollution.
 - b. In compliance with the specifications and conditions of the Plan Approval issued under the corresponding number.
 - Operated and maintained in a manner consistent with good operating and management practices.
- This permit is valid only for the specific equipment, location and owner named above.
- 3. See attached.

Failure to comply with the conditions placed on this permit is a violation of Section 127.444. Violation of this or any other provision of Article III of the Rules and Regulations of the Department of Environmental Protection will result in suspension or revocation of this permit and/or prosecution under Section 9 of the Air Pollution Control Act.

Issued: 10/12/00

Regional Air Quality Manager

RACT OPERATING PERMIT 04-000-227

Special Conditions

- This RACT Operating Permit is for the sources of NOx at Koppel Steel's facility located in Ambridge and imposes the following conditions to meet the RACT provisions of Chapter 129.
- 4. In accordance with 25 Pa. Code §129.93(c)(1) and Koppel's RACT proposal, the following sources shall be operated and maintained in accordance with the manufacturer's specifications:
 - Reheat furnace
 - b. 5" upsetter furnace
 - c. 7.5" upsetter furnace
 - d. Gas space heaters
- In accordance with 25 Pa. Code §129.93(b)(2) and Koppel's RACT proposal, the following sources shall have an annual adjustment or tune-up on the combustion process:
 - Quench furnace
 - Temper furnace
 - Off Mill Normalize furnace
- The rotary hearth furnace shall employ low excess air at a percentage of approximately 10% to minimize NOx formation as described in Koppel's RACT application.
- The owner/operator shall perform a DEP approved stack test on the rotary hearth furnace for oxides of nitrogen (NO2), carbon monoxide (CO), and VOC as nonmethane hydrocarbons during the term of the permit.
- Stack testing shall be performed in accordance with 25 PA. Code Chapter 139 regulations and the Department's Source Testing Manual.
- Two copies of the stack test shall be supplied to the Department for review within 60 days of completion of testing.
- The Department shall be notified at least two weeks in advance of the date and time
 of the stack test so that an observer may be present.

- 8. The owner/operator shall perform an annual test utilizing a portable analyzer for oxides of nitrogen (NOx) and carbon monoxide (CO) on the following furnaces: rotary hearth, quench, temper, reheat, and off-mill normalize. The test may take place while the annual tune-up is being performed.
- The owner/operator shall submit a complete operating procedure for the portable analyzer, including calibration, QA/QC, and emission calculation methods.
- 10. The owner/operator shall retain on site the results of the portable analyzer tests for a period of not less than two years.
- 11. The owner/operator shall notify the Department's Air Quality Inspector at least one week prior to the performance of the portable analyzer tests.
- 12. All sources and air cleaning devices shall be operated and maintained in accordance with good air pollution control practices.