

Operating Permit Conditions
Permit No. OP-09-0023
Laclede Steel Company

Conditions (continued):

3. General Requirements

- A. The expiration date shown on the Operating Permit, OP-09-0023, is for state purposes only. For Federal enforcement purposes the Operating Permit shall remain in effect as part of the Pennsylvania State Implementation Plan (SIP) until repealed pursuant to 40 CFR §51 and approved by the United States Environmental Protection Agency (EPA). The Operating Permit shall become enforceable by the EPA upon its approval of the above as a revision to the SIP.
- B. This Operating Permit is being issued to Laclede Steel Company for the operation of oxides of nitrogen (NOx) and volatile organic compounds (VOCs) emissions sources regulated under 25 PA Code §§129.91-129.95. This Operating Permit, OP-09-0023, also specifies Laclede Steel Company, Reasonable Available Control Technology (RACT) requirements for sources of NOx. Other pollutants are regulated under the applicable provisions of Title 25 of the Pennsylvania Code and by existing permit conditions which are incorporated herein.
- C. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and shall allow the Department to have access at any time to said source(s) with such measuring and recording equipment, including equipment for recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.
- D. If at any time the Department has cause to believe that air contaminant emissions from the aforementioned source may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Resources, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Resources, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

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Conditions (continued):

4. Facility Inventory

This Operating Permit covers the following sources located at Laclede Steel Company, Fairless Works, Fairless Hills, Falls Township, Bucks County.

<u>Emission Sources</u>	<u>Rated Capacity</u>	<u>Fuel Used</u>
18" Skelp Mill	200 MMBtu/hr	Natural Gas
No. 1 CBW ¹ Mill	150 MMBtu/hr	Natural Gas
No. 2 CBW ¹ Mill	180 MMBtu/hr	Natural Gas
Galvanize Kettle	11.6 MMBtu/hr	Natural Gas
Super Heater	4.2 MMBtu/hr	Natural Gas

¹CBW: Continuous Butt welder

5. RACT Implementation

A. RACT for the sources listed in Condition 4 as 18" Skelp Mill, No. 1 CBW and No. 2 CBW shall be an annual tune-up on the combustions process. The annual tune-up of the combustion process shall consist of but not be limited to the following.

- (1) Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
- (2) Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO_x, and, to the extent practicable, minimize the emissions of CO.
- (3) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.
- (4) Each adjustment conducted under the procedures in Condition 5(b) shall be recorded in a permanently bound log book.
 - a. the date of the tuning procedure.
 - b. the name of the service company and technicians
 - c. the final operating rate or load
 - d. the final CO and NO_x emission rates
 - e. the final excess oxygen rate

B. RACT for the sources listed in Condition 4 as the Galvanize Kettle and Super Heater shall be the installation, maintenance, and operation of the sources in accordance with manufacturers specifications [§129.93(c)].

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Conditions (continued):

- C. Implementation of the approved NOx control technology for each source listed in Condition 4 shall be completed no later than May 31, 1995.
- D. The cleanup solvent for the Pipe Coating Operation constitutes a de minimus source of volatile organic compounds (VOCs).

6. Emission Limitations

- A. The following air containment emission limitations are approved for the 18" skelp mill, No. 1 CBW mill and No. 2 CBW mill. The Department reserves the right to establish and impose more stringent limitations based on the results from stack testing.
 - (1) For the 18" skelp mill and No. 1 & 2 CBW mills the emissions of oxides of nitrogen (NOx) shall be limited to 0.55 lb/MMBtu, on a twenty-four (24) hour basis, when firing natural gas.
- B. Testing shall be done in accordance with the provisions of 25 PA Code Chapter 139 and conditions 6(c) and (d) below.
- C. At least sixty (60) days prior to the test, Laclede Steel Company shall inform the Regional Air Program Manager of the date and time of the test and submit to the Department for approval the procedures for the test and a sketch with dimensions indicating the location of the sampling ports and other data to ensure the collection of representative samples.
- D. Within thirty (30) days after the source test(s), two (2) copies of the complete test report, including all operating conditions, shall be submitted to the Regional Air Program Manager for approval.
- E. An annual stack test shall be performed so that compliance with Condition 5(a) can be verified. The stack testing shall be done in accordance with the provisions of 25 PA Code Chapter 139 and Conditions 6(b) through (d) above.

7. Hours of Operation

The 18" Skelp Mill, No. 1 CBW Mill, No. 2 CBW Mill, Galvanize Kettle and Super Heater shall not be limited in their hours of operation.

8. Recordkeeping Requirements

A bound logbook for each source listed in Condition 4 will be kept and sufficient data recorded so that compliance with Conditions 5 and 6 can be determined. Records shall be kept for a minimum of two (2) years and shall be made available to the Department upon request.