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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FIELD OPERATIONS - BUREAU OF AIR QUALITY

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 source(s) described below:

Permit No.	<u>OP-46-0011</u>	Source(s)	<u>Facility VOC and NOx RACT</u>
Owner	<u>Bethlehem Lukens Plate</u>	Air	<u></u>
Address	<u>P.O. Box 842</u>	Cleaning	<u></u>
	<u>Conshohocken, PA 19428</u>	Device	<u>As described herein</u>
Attention	<u>Mr. Reza "Ray" Ajalli</u>	Location	<u>Plymouth Township</u>
	<u>Project Manager</u>		<u>Montgomery County</u>

This permit is subject to the following conditions:

1. That the source(s) 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 of all applicable plan approvals issued;
 - c. operated and maintained in a manner consistent with good operating and maintenance practices.
2. This permit is valid only for the specific equipment, location and owner named above.

(SEE ADDITIONAL CONDITIONS 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 12/11/1998

Expires 12/10/2003


Francine Carlini
Regional Manager
Air Quality

cc: Division of Permits, RCSOB
Administration
SEFO
Re (RN)328-18

OPERATING PERMIT CONDITIONS
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BETHLEHEM LUKENS PLATE

CONDITIONS (continued):

3. This Operating Permit incorporates Reasonably Available Control Technology (RACT) determinations as required by Title I provisions of the Clean Air Act Amendments and 25 Pa. Code Section 129.91 through 129.95 for:
- 200 HP Steam Generator (Boiler)
 - 300 HP Steam Generator (Boiler)
 - Drever Furnace
 - Quench Furnace
 - Temper Furnace
 - Slab Reheating Furnace No. 1
 - Slab Reheating Furnace No. 2
 - Miscellaneous Cutting Torches
 - Rose Annealing Furnace
 - Steel Plate Roll Painting Operation
 - Parts Degreasers (Safety Kleen Units)
 - Fugitive Natural Gas Lines
 - Space Heaters
 - Plate Marking Operation
 - Stencil Paint Operation
 - Freeze Protection (Methanol Antifreeze)
 - Four Slab Preheaters No. 1 through No. 4
 - Miscellaneous VOC emissions resulting from cleaning fluids for maintenance
 - Three APB Preheaters No. 1 through No. 3
 - Four Emergency Diesel Generators
 - Emergency WWTP Diesel Pump,
 - Propane Vaporizer
 - Above ground storage tanks
4. This RACT Operating Permit supersedes Operating Permit No. 46-302-196 with respect to 200 and 300 HP Steam Generators, Permit No. 46-307-005 with respect to Quench Furnace and Temper Furnace, Permit No. 46-307-003 with respect to Slab Heating Furnaces No. 1 and No. 2, and Permit No. 46-307-006 with respect to Rose Annealing Furnace for the incorporation of NOx/VOC Reasonably Available Control Technology (RACT) requirements of 25 Pa. Code Section 129.91-95. The terms and conditions of these Permits are incorporated in this RACT Permit.
5. As per 25 Pa. Code Section 129.93 (c) (1) of NOx RACT requirements, the 200 and 300 HP Steam Generators (Boilers), Space Heaters, Four Slab Preheaters, three APB Preheaters, One emergency WWTP pump, Miscellaneous Cutting Torches, and One Propane Vaporizer as described in Condition 3 herein shall be **maintained and operated** in accordance with manufacturers specifications. They shall additionally be **maintained and operated** in accordance with good air pollution control practices.

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CONDITIONS (continued):

6. Pursuant to presumptive RACT requirements of 25 Pa. Code § 129.93(c)(5), four emergency generators rated at 1000, 300, 150, and 125 KW shall not operate more than 500 hours in any consecutive 12 month period. Additionally, all four emergency generators shall be maintained and operated in accordance with manufacturers' specifications as well as in accordance with good air pollution control practices.
7. Drever furnace, quench furnace, Temper furnace, Slab Heating furnace No. 1, Slab Heating furnace No. 2, and Rose Anneal furnace shall be maintained and operated in accordance with manufacturer's specifications as well as in accordance with good air pollution control practices.
8. NOx emissions from Drever furnace, Slab Heating furnace No. 1, Slab Heating furnace No. 2, Rose Anneal furnace, Quench furnace, and Temper furnace shall be limited to the following:

Furnace	NOx emission limit, tons per year
Slab Heating Furnace 1	85.97
Slab Heating Furnace 2	187.34
Rose Annealing Furnace	36.84
Quench Furnace	50.55
Temper Furnace	19.78

* 12-month rolling basis

Fuel usage of the following six furnaces shall be limited as per the following Table and the annual NOx emissions from these sources shall be determined by multiplying the annual usage of natural gas by corresponding emission factor:

Source	NG Fuel Usage cubic feet thousand		Emission Factor
	Monthly	Annual	LB NOx/1000CF NG
Slab Heating Furnace 1	156,240	1,874,880	0.388
Slab Heating Furnace 2	151,821	1,821,848	0.198
Rose Annealing Furnace	46,988	575,856	0.140
Quench Furnace	74,638	895,657	0.140
Temper Furnace	23,570	282,839	0.100

10. The potential to emit volatile organic compounds from each of the following sources shall never exceed 3 pounds per hour, 15 pounds per day or 2.7 tons per year. Should any of these limitations ever be exceeded for any of the sources listed below, a detailed RACT analysis which meets the criteria specified in Section 129.92 of Chapter 129 of Article III of the Rules and Regulations of the Department of Environmental Protection must be submitted to the Department for each source category.

200 HP Steam Generator
300 HP Steam Generator
Drever Furnace

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CONDITIONS (continued):

Quench Furnace
Temper Furnace
Two Slab Heating Furnaces No. 1 and No. 2
Miscellaneous Cutting Torches
Rose Annealing Furnace
Space Heaters
Slab Preheaters No. 1 through No. 4
APB Preheaters No. 1 through No. 3
Four Emergency Generators (1000 KW, 300 KW, 150 KW & 125 KW)
One Emergency Waste Water Treatment Plant (WWTP) Diesel Pump
Above ground storage tanks
Propane Vaporizer
VOC emissions resulting from miscellaneous cleaning fluids for maintenance
Safety-Kleen or Similar Parts Washers
Freeze Protection
VOC emissions from miscellaneous maintenance painting
VOC emissions from maintenance lubricant sprays

11. The VOC RACT requirements for the sources addressed in condition No. 3 is as follows: These sources shall be maintained and operated in accordance with manufacturers' specifications as well as in accordance with good air pollution control practices.
2. The VOC emissions from the steel plate roll painting sources shall comply with 25 Pa. Code § 129.52 requirements.
13. The VOC emissions from Parts Degreasers which have an opening greater than ten (10) square feet shall comply with the 25 Pa. Code § 129.63 requirements.
14. Pursuant to the VOC RACT, the Parts Degreasers which have a opening less than ten (10) square feet shall be maintained and operated in accordance with manufacturers' specification as well as in accordance with good air pollution control practices.
15. Recordkeeping Requirements:
 - A. Lukens shall keep record of amount of fuel used per month for each furnace on a 12-month rolling basis.
 - B. Lukens shall keep a record of the amount of paint used on a 12-month rolling basis in each steel plate roll painting operation. In addition, the weight of VOCs per gallon of coating (minus water) shall also be recorded

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CONDITIONS (continued):

- C. Lukens shall keep record of number of hours of operation in any 12 consecutive month period for each emergency generator described in Condition 6.
- D. The records shall be retained for at least 2 (two) years and shall be made available to the Department upon request.
- E. Lukens shall maintain comprehensive, accurate records of any additional data as required in accordance with 25 Pa. Code § 129.95.

