COMMONWEALTH OF PENNS) ANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION FIELD OPERATIONS - BUREAU OF AIR QUALITY 1 3 000

OPERATING PERMIT

In accordance with provisions of the Air Pollution Control Act, the act of January 8, 1960, P.L. 2119, <u>as</u> <u>amended</u>, 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.	OP-09-0006	Source(s)	Facility VOC and NOx RACT
Owner	U.S. Steel Group/USX Corporation	Air	
Address	Fairless Plant	Cleaning	-
	Fairless Hills, PA 19030	Device	
Attention	Mr. Alan Lewis	Location	Fairless Works
	Senior Environmental Engineer		Falls Township
			Bucks County

This permit is subject to the following conditions:

- 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 and conditions of all applicable plan approvals issued;
 - 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 4/8/1999

Carlin

Erancine Carlini Regional Manager Air Quality

Expires -4/8/2004-

cc: Division of Permits, RCSOB Administration SEFO Re (GJC99)55-41

OPERATING PERMIT CONDITIONS APPLICATION NO. OP-09-0006 U.S. STEEL GROUP/USX CORPORATION

CONDITIONS (continued):

 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 Sections 129.91 through 129.95 for:

> No. 1 Batch Annealing Furnace (30 individual furnaces) No. 2 Continuous Annealing Furnace Galvaneal Furnace Galvanizing Line Furnace Electrolyte Tinning Line (ETL) Anode Furnace Space heaters All Combustion Units Cold Rolling Mill, 4-Stand Cold Rolling Mill, 5-Stand Double Cold Reduction Mill

- 4. The expiration date shown on this RACT Operating Permit is for State purposes. For Federal Enforcement purposes, the RACT portion of this RACT Operating Permit shall remain in effect as part of the State Implementation Plan (SIP) until replaced, pursuant to 40 CFR 51 and approved by the U.S. Environmental Protection Agency (EPA).
- 5. If, any time, the permittee causes, permits or allows any modification (as that term is defined in Chapter 121 of Title 25, the Rules and Regulations of the Department of Environmental Protection of the aforementioned air contamination source(s), the operation and use of which is authorized by this permit, the permit shall be suspended, and the permittee shall not thereafter continue to operate or use said air contamination source(s).
- 6. If, at any time, the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in any condition contained herein or 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 Protection, 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 Protection, 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.

PERATING PERMIT CONDITIC APPLICATION NO. OP-09-0006 U.S. STEEL GROUP/USX CORPORATION

CONDITIONS (continued):

- 7. This Operating Permit is valid for a limited period of time and may be renewed before its expiration. Requests for an Operating Permit renewal must be in writing and must be accompanied by the appropriate permit application processing and annual permit administration fees, as specified in Section 127.703 of the Rules and Regulations of the Department of Environmental Protection. These fees shall be paid in the form of a check payable to the "Commonwealth of Pennsylvania-Clean Air Fund." The request should be made using the appropriate application form and must be received by the Department, along with a completed Air Pollution Control Act Compliance Review form no later than 30 days prior to the expiration date of this permit.
- 8. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s), and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment 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.
- For the following sources, RACT shall be the installation, maintenance and operation of the sources in accordance with manufacturers specifications: No. 1 Batch Annealing Furnaces (30 furnaces), Galvaneal Furnace, ETL Anode Furnace, Space Heaters, and Electrical Maintenance Shop Bake Ovens.
- RACT for the following three VOC emitting sources shall be good operating practices and limiting the VOC content of rolling oils and corrosion inhibitors to less than 5% by weight: Cold Reduction Mill 4-Stand, Cold reduction Mill 5-Stand, and Double Cold Reduction Mill.
- Present combustion systems installed on the No. 2 Continuous Annealing Furnace and the Galvanizing Line Furnace are considered RACT. The company shall follow good operating procedure in operating these furnaces.
- 12. Presumptive RACT Requirements:
 - A. The owner or operator shall conduct an annual adjustment or tune-up on the combustion units of the No. 2 Continuous Annealing Furnace and the Galvanizing Line Furnace. The adjustment shall include but not limited to the following:
 - Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.

OPERATING PERMIT CONDITIC...S APPLICATION NO. OP-09-0006 U.S. STEEL GROUP/USX CORPORATION

CONDITIONS (continued):

- Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NOx and to the extent practicable minimize emissions of CO.
- (iii) Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.
- B. The owner or operator shall record each adjustment in a permanently bound log book or other method approved by the Department. This log shall contain, at a minimum, the following information:
 - (i) The date of the tuning procedure.
 - (ii) The name of the service company and technician(s).
 - (iii) The final operating rate or load.
 - (iv) The final CO and NOx emission rates.
 - (v) The final excess oxygen rate.
- 13. Monitoring, Recordkeeping and Reporting Procedures:
 - A. The owner or operator shall record the type of fuel being used by each of the combustion units and the number of hours of operation using each type of fuel.
 - B. The owner or operator shall keep records to demonstrate compliance with 25 Pa. Code Sections 129.91-129.94.
 - C. The records shall provide sufficient data and calculations to clearly demonstrate that the requirements of 25 Pa. Code Sections 129.91-129.94 are met.
 - D. Data or information required to determine compliance shall be recorded and maintained in a time frame consistent with the averaging period of the requirement.
 - E. The record shall be retained for at least five years and shall be made available to the Department on request.

Re 30 (GJC99)55-41a