COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION SOUTHWEST REGION - FIELD OPERATIONS AIR QUALITY 400 WATERFRONT DRIVE PITTSBURGH, PENNSYLVANIA 15222-4745

File

RACT OPERATING PERMIT

In accordance with provisions of the Air Pollution Control 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.:_65-000-183

Source : NOx Sources

- Owner : Allegheny Ludium Steel Corp. Air Address : 100 River Road Brackenridge, PA 15014 Plant: West Leechburg Plant
- Attention : Richard S. Klugh
 Location: WestLeechburgBorough

 Environmental Affairs Director
 County: Westmoreland

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 same number;
 - (c) operated and maintained in a manner consistent with good operating and management practices.
- 2. 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: 03/23/99

seph P. Pezze

Regional Air Quality Manager

PERMIT TERM: 3/23/99 - 3/23/04

Special Conditions

legheny Ludlum Corp. West Leechburg Plant RACT Operating Permit No. 65 - 000 - 183

- 3. This is a RACT Approval and Operating Permit for all NOx sources as identified in the RACT proposal at the Allegheny Ludium Corporation, West Leechburg Plant.
- 4. The facility is to be operated in accordance with the RACT plan submitted as approved herein.
- 5. Facility wide NOx emissions shall not exceed 874 tons/yr combined total, in any 12 month consecutive period. NOx emission for individual sources shall not exceed the following:

Source	TPY	lb/hr
No. 71 Annealing Furnace	44	10.0
No. 71 Pickle Line	43	10.0
No. 46 Annealing Furnace	41	10.0
No. 46 Pickle Line	71	16.0
No. 21 Pickle Line	25	6.0
No. 45 Pickle Line	• 11	2.5
No. 2 Pickle Line	25	6.0
No. 66 Furnaces	50	12.0
No. 67 Furnaces	44	10.0
No. 55 Normalizer	56	13.0
No. 56 Normalizer	68	16.0
No. 8 Boiler	139	32.0
No. 9 Boiler	139	32.0
No. 10 Boiler	43	10.0

- Allegheny Ludlum shall maintain and operate the No. 71 and No. 46 Annealing Furnaces subject to 25 Pa Code Ch. 129.92 within manufacturers' specifications and in a manner consistent with good operating procedures.
- Allegheny Ludlum shall maintain and operate the No. 8, No. 9 and No. 10 Boilers subject to 25 Pa Code Ch.129.92 within manufacturers' specifications and in a manner consistent with good operating procedures.
- 8. Allegheny Ludlum Corp. shall maintain and operate all combustion sources with individual rated gross heat inputs of less than 20 MM Btu/hr. as identified, subject to 25 Pa Code Ch.129.93 (c)(1) in accordance with the manufacturers' specifications.
- Allegheny Ludium shall perform an annual adjustment or tune up on all combustion sources with individual rated heat inputs between 20 and 50 MM Btu/hr as identified, subject to 25 Pa Code Ch.129.93 (b)(2).

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Special Conditions

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- 10. Allegheny Ludium shall maintain records for each adjustment conducted under the procedures outlined in 25 Pa Code Ch. 129.93(b)(2) (i-iii) for all identified combustion sources subject to Special Condition No. 8. These records shall contain, at a minimum, the following information; the date of the tuning procedure, the name of the service company and technicians, the final operating rate or load, the final CO and NOx emission rates, the final excess oxygen rate and any other additional information as required by this operating permit.
- 11. Allegheny Ludlum shall maintain records of natural gas and/or coal usage, calculated monthly, for all combustion sources with an individual rated heat input greater than 50 MM Btu/hr.
- 12. Allegheny Ludium shall maintain records in accordance with the recordkeeping requirements of 25 Pa Code Ch. 129.95. The records shall provide sufficient data and calculations to clearly demonstrate that the requirements of 25 Pa Code Ch. 129.91-94 are met and to verify compliance with requirements of this RACT approval. Data and information required to determine compliance shall be recorded and maintained in a time frame consistent with averaging periods to verify compliance. These records shall be retained for at least 2 years and shall be made available to the Department upon request.
- 13. Allegheny Ludium shall maintain records of total steel production, calculated monthly, for each calendar year.
- 14. This RACT approval/permit apply to the emissions of NOx only. Emissions of other pollutants, including criteria pollutants, shall be governed by existing Plan Approvals, Operating Permits and the applicable requirements of the Rules and Regulations of the Department. Such approvals, permits a requirements shall remain in effect.
- 15. The expiration date shown on the Operating Permit is for state purposes. For Federal enforcement purposes, the RACT revisions of this 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).