



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: December 8, 2015

Effective Date: January 22, 2020

Revision Date: January 22, 2020

Expiration Date:

Revision Type: Modification, Significant

In accordance with the provisions of the Air Pollution Control Act, the Act of January 8, 1960, P.L. 2119, as amended, and 25 Pa. Code Chapter 127, the Owner, [and Operator if noted] (hereinafter referred to as permittee) identified below is authorized by the Department of Environmental Protection (Department) to operate the air emission source(s) more fully described in this permit. This Facility is subject to all terms and conditions specified in this permit. Nothing in this permit relieves the permittee from its obligations to comply with all applicable Federal, State and Local laws and regulations.

The regulatory or statutory authority for each permit condition is set forth in brackets. All terms and conditions in this permit are federally enforceable applicable requirements unless otherwise designated as "State-Only" or "non-applicable" requirements.

TITLE V Permit No: 43-00310

Federal Tax Id - Plant Code: 25-1822919-1

Owner Information

Name: TOP GUN INVESTMENT CORP II
Mailing Address: 15 ROEMER BLVD
FARRELL, PA 16121-2201

Plant Information

Plant: NLMK PENNSYLVANIA LLC/FARRELL PLT
Location: 43 Mercer County 43002 Farrell City
SIC Code: 3316 Manufacturing - Cold Finishing Of Steel Shapes

Responsible Official

Name: WILLIAM WEIR
Title: ENVIRONMENTAL MANAGER
Phone (724) 983 - 6464 Ext.1155

Permit Contact Person

Name: WILLIAM WEIR
Title: ENVIRONMENTAL MANAGER
Phone: (724) 983 - 6464 Ext.1155

[Signature]

ERIC A. GUSTAFSON, NORTHWEST REGION AIR PROGRAM MANAGER

Pages 2-29, 31, 33-42, 45-104, and 107-115 of the permit are redacted in full.

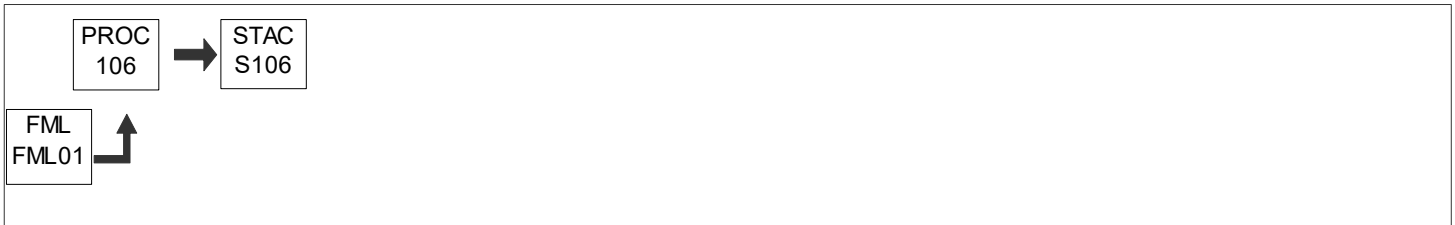
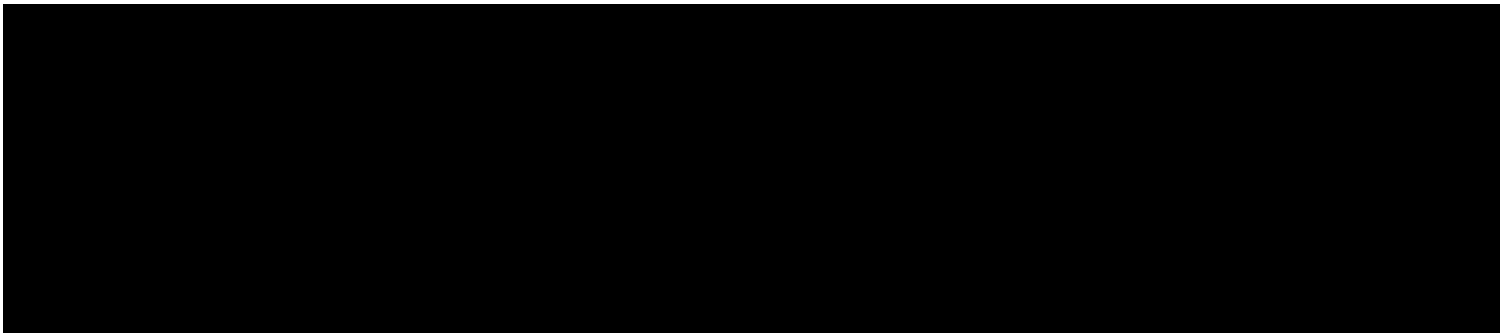
**SECTION D. Source Level Requirements**

Source ID: 106

Source Name: SLAB REHEAT FURNACE 1

Source Capacity/Throughput:	150.000 Tons/HR	STEEL
	284.000 MCF/HR	Natural Gas

Conditions for this source occur in the following groups: [REDACTED]
GROUP 5 - NOX AVERAGING

**I. RESTRICTIONS.****Emission Restriction(s).**

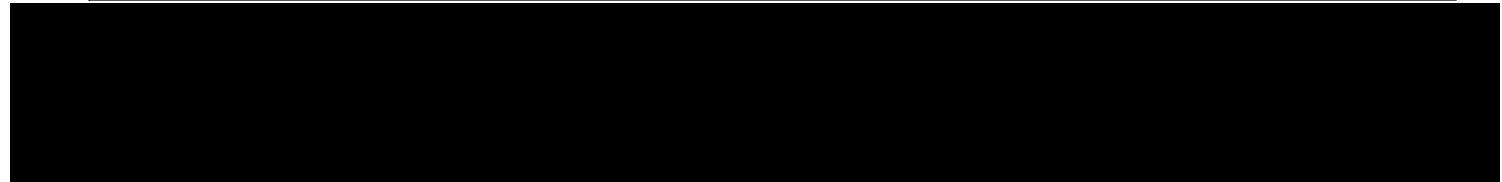
003 [REDACTED]

Operating permit terms and conditions.

The NOx emissions from Source 106 shall not exceed the following:

- 0.14 pounds per thousand cubic foot of natural gas usage.

[From the October 18, 2019, approval of the RACT II facility-wide NOx emissions averaging plan.]

**Throughput Restriction(s).**

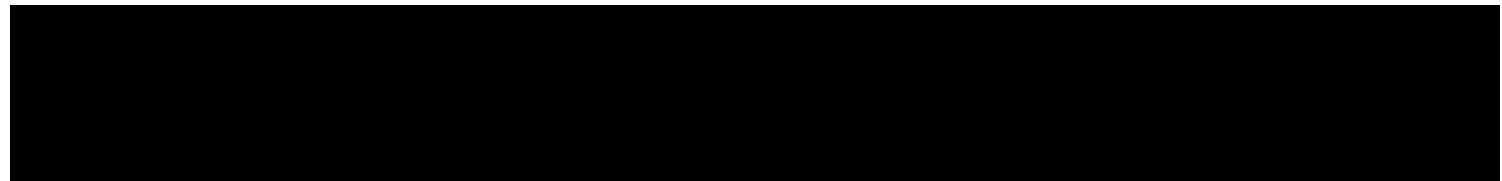
005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The natural gas usage for Source 106 shall not exceed the following based on a 30-day rolling total:

- 136.967 million cubic feet.

[From the October 18, 2019, approval of the RACT II facility-wide NOx emissions averaging plan.]



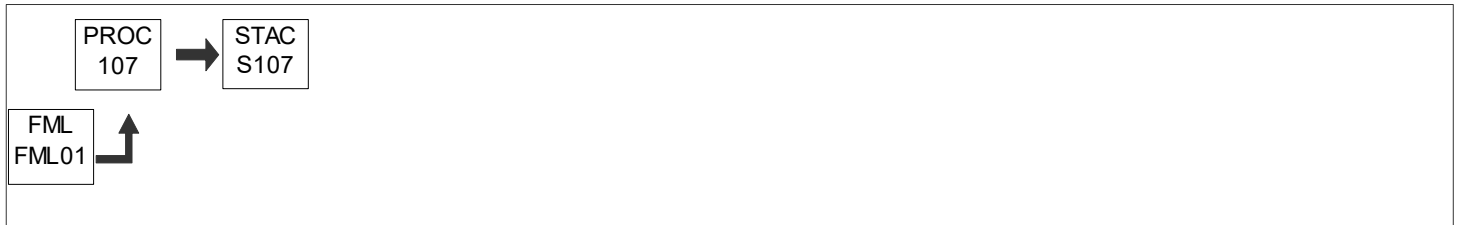
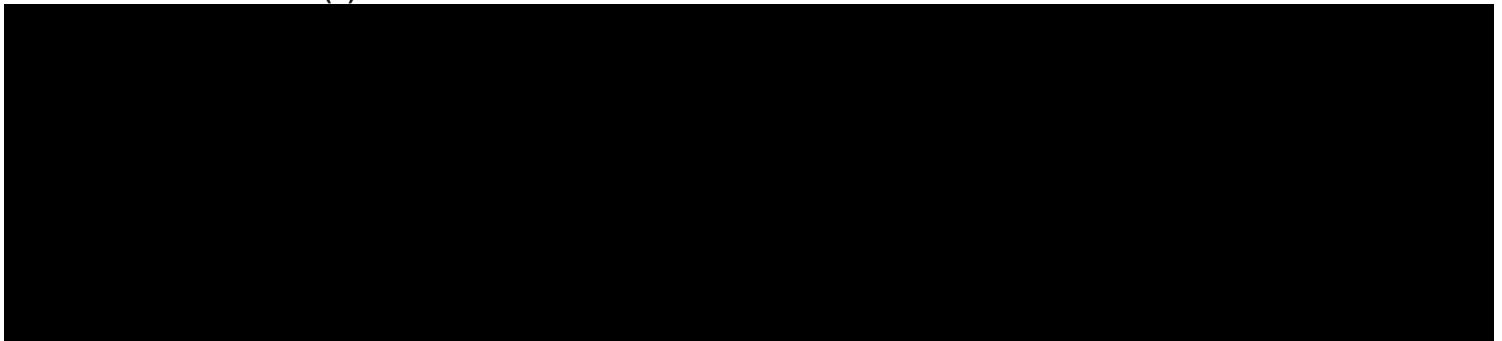
**SECTION D. Source Level Requirements**

Source ID: 107

Source Name: SLAB REHEAT FURNACE 2

Source Capacity/Throughput:	150.000 Tons/HR	STEEL
	284.000 MCF/HR	Natural Gas

Conditions for this source occur in the following groups: [REDACTED]
GROUP 5 - NOX AVERAGING

**I. RESTRICTIONS.****Emission Restriction(s).**

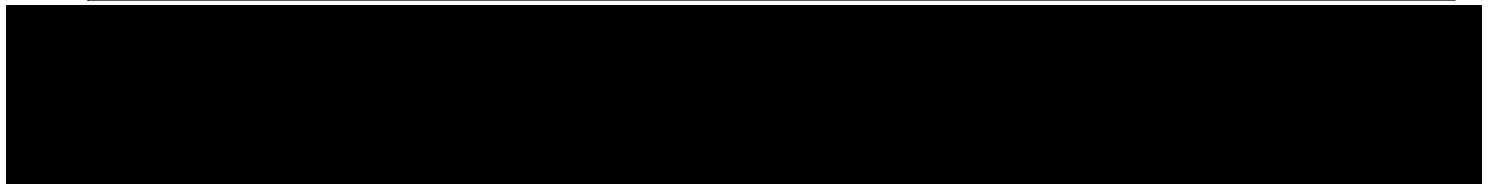
003 [REDACTED]

Operating permit terms and conditions.

The NOx emissions from Source 107 shall not exceed the following:

- 0.14 pounds per thousand cubic foot of natural gas usage.

[From the October 18, 2019, approval of the RACT II facility-wide NOx emissions averaging plan.]

**Throughput Restriction(s).**

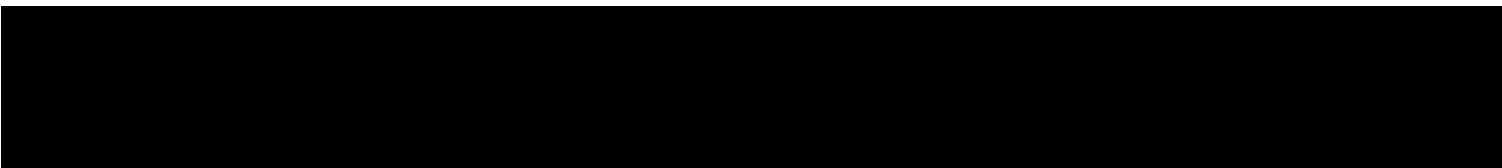
005 [25 Pa. Code §127.441]

Operating permit terms and conditions.

The natural gas usage for Source 107 shall not exceed the following based on a 30-day rolling total:

- 136.967 million cubic feet.

[From the October 18, 2019, approval of the RACT II facility-wide NOx emissions averaging plan.]



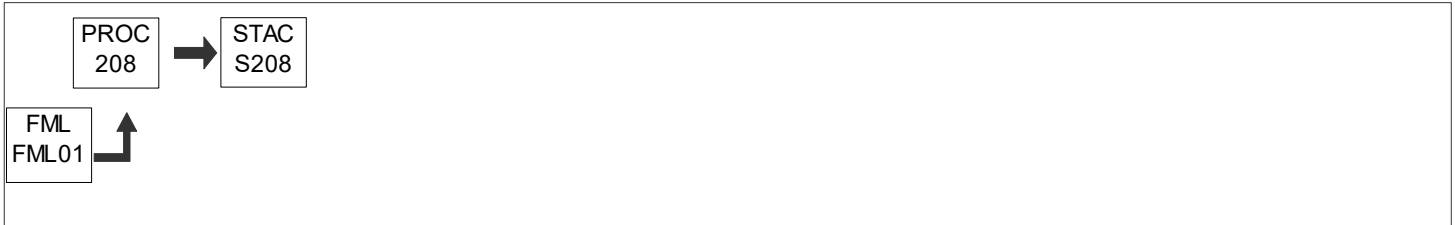
**SECTION D. Source Level Requirements**

Source ID: 208

Source Name: SLAB REHEAT FURNACE 3

Source Capacity/Throughput:	150.000 Tons/HR	STEEL
	301.600 MCF/HR	NATURAL GAS

Conditions for this source occur in the following groups: GROUP 5 - NOX AVERAGING

**I. RESTRICTIONS.****Emission Restriction(s).**

004

Operating permit terms and conditions.

The NOx emissions from Source 208 shall not exceed the following:

- 0.058 pounds per thousand cubic foot of natural gas usage.

[From the October 18, 2019, approval of the RACT II facility-wide NOx emissions averaging plan.]

**SECTION D. Source Level Requirements****Throughput Restriction(s).****# 006****Operating permit terms and conditions.**

The natural gas usage for Source 208 shall not exceed the following based on a 30-day rolling total:

- 217.152 million cubic feet.

[From the October 18, 2019, approval of the RACT II facility-wide NOx emissions averaging plan.]

**SECTION E. Source Group Restrictions.**

Group Name: GROUP 5 - NOX AVERAGING

Group Description: NOx emissions averaging plan approved Oct. 18, 2019, in accordance with RACT II provisions o

Sources included in this group

ID	Name
106	SLAB REHEAT FURNACE 1
107	SLAB REHEAT FURNACE 2
208	SLAB REHEAT FURNACE 3

I. RESTRICTIONS.**Emission Restriction(s).****# 001****Facility-wide or system-wide NOx emissions averaging plan general requirements.**

The owner and operator of the air contamination sources included in a facility-wide or system-wide NOx emissions averaging plan submitted under subsection 129.98(b) shall be liable for a violation of an applicable NOx RACT emission limitation at each source included in the NOx emissions averaging plan.

[From the October 18, 2019, approval of the RACT II facility-wide NOx emissions averaging plan. This condition is also from 25 Pa. Code § 129.98(m).]

II. TESTING REQUIREMENTS.**# 002****Operating permit terms and conditions.**

The facility shall conduct NOx stack testing, for each source listed above, within 5 years of incorporating RACT II conditions into the facility operating permit and subsequent testing shall be conducted within 5 years of the latest test. The testing shall be conducted in accordance with the requirements of Chapter 139, Subchapter A (relating to sampling and testing methods and procedures).

[From the October 18, 2019, approval of the RACT II facility-wide NOx emissions averaging plan.]

[The RACT II conditions are incorporated into the Title V operating permit on January 22, 2020. The initial RACT II NOx stack testing for Sources 106, 107, & 208 is due no later than January 21, 2025.]

IV. RECORDKEEPING REQUIREMENTS.**# 003****Facility-wide or system-wide NOx emissions averaging plan general requirements.**

An air contamination source or facility included in the facility-wide or system-wide NOx emissions averaging plan submitted in accordance with 25 Pa. Code subsections 129.98(b)—(g) may be included in only one facility-wide or system-wide NOx emissions averaging plan.

[From the October 18, 2019, approval of the RACT II facility-wide NOx emissions averaging plan. This condition is also from 25 Pa. Code § 129.98(h).]

004**Facility-wide or system-wide NOx emissions averaging plan general requirements.**

The owner or operator of an air contamination source or facility included in a facility-wide or system-wide NOx emissions averaging plan submitted in accordance with subsections 129.98 (b) -- (h) that achieves emission reductions in accordance with other emission limitations required under the act or the Clean Air Act, or regulations adopted under the act or the Clean Air Act, that are not NOx RACT emission limitations may not substitute those emission reductions for the emission reductions required by the facility-wide or system-wide NOx emissions averaging plan submitted to the Department or appropriate approved local air pollution control agency under subsection 129.98(b).

**SECTION E. Source Group Restrictions.**

[From the October 18, 2019, approval of the RACT II facility-wide NOx emissions averaging plan. This condition is also from 25 Pa. Code § 129.98(k).]

005**Facility-wide or system-wide NOx emissions averaging plan general requirements.**

The application for the operating permit modification or the plan approval, if otherwise required, for averaging NOx emissions on either a facility-wide or system-wide basis using a 30-day rolling average submitted under subsection 129.98(b) must demonstrate that the aggregate NOx emissions emitted by the air contamination sources included in the facility-wide or system-wide NOx emissions averaging plan using a 30-day rolling average are not greater than the NOx emissions that would be emitted by the group of included sources if each source complied with the applicable NOx RACT emission limitation in § 129.97 on a source-specific basis.

[This condition is from 25 Pa. Code § 129.98(d).] [The RACT II emissions averaging plan for NOx was received from the facility owner on October 17, 2016. It was approved by the Department on October 18, 2019.]

006**Facility-wide or system-wide NOx emissions averaging plan general requirements.**

The owner or operator shall calculate the alternative facility-wide or system-wide NOx RACT emissions limitation using a 30-day rolling average for the air contamination sources included in the application for the operating permit modification or plan approval, if otherwise required, submitted under subsection 129.98(b) by using the following equation to sum the emissions for all of the sources included in the NOx emissions averaging plan:

$$[S_{ni} = 1 E_{iactual}] \leq [S_{ni} = 1 E_{iallowable}]$$

Where:

$E_{iactual}$ = The actual NOx mass emissions, including emissions during start-ups, shutdowns and malfunctions, for air contamination source i on a 30-day rolling basis.

$E_{iallowable}$ = The allowable NOx mass emissions computed using the allowable emission rate limitations for air contamination source i on a 30-day rolling basis specified in § 129.97. If an air contamination source included in an averaging plan is subject to a numerical emission rate limit that is more stringent than the applicable allowable emission rate limitation in § 129.97, then the numerical emission rate limit shall be used for the calculation of the allowable NOx mass emissions.

n = The number of air contamination sources included in the NOx emissions averaging plan.

[This condition is from 25 Pa. Code § 129.98(e).]

V. REPORTING REQUIREMENTS.**# 007****Facility-wide or system-wide NOx emissions averaging plan general requirements.**

The owner or operator of an air contamination source or facility included in the facility-wide or system-wide NOx emissions averaging plan submitted in accordance with 25 Pa. Code subsections 129.98(b)--(h) shall submit the reports and records specified in § 129.98(g)(3) to the Department or appropriate approved local air pollution control agency on the schedule specified in § 129.98(g)(3) to demonstrate compliance with § 129.100.

[From the October 18, 2019, approval of the RACT II facility-wide NOx emissions averaging plan. This condition is also from 25 Pa. Code § 129.98(j).]