



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM

TITLE V/STATE OPERATING PERMIT

Issue Date: December 21, 2017

Effective Date: August 16, 2019

Revision Date: August 15, 2019

Expiration Date: [REDACTED]

Revision Type: Modification

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: 44-05001

Federal Tax Id - Plant Code: 32-0020058-1

Owner Information

Name: STD STEEL LLC
Mailing Address: 500 N WALNUT ST
BURNHAM, PA 17009-1644

Plant Information

Plant: STD STEEL/BURNHAM
Location: 44 Mifflin County 44802 Burnham Borough
SIC Code: 3312 Manufacturing - Blast Furnaces And Steel Mills

Responsible Official

Name: JOHN HILTON
Title: PRESIDENT & CH OP OFFICER
Phone (717) 248 - 4911

Permit Contact Person

Name: DALE A STEHLEY
Title: ENVIRONMENTAL ENGINEER
Phone: (717) 242 - 4629

[Signature] _____

William R. Weaver

WILLIAM R. WEAVER, SOUTHCENTRAL REGION AIR PROGRAM MANAGER

Pages 2-107 fully redacted

**SECTION E. Source Group Restrictions.**

Group Name: 12

Group Description: Case-by-Case RACT 2 Requirements

Sources included in this group

**RACT 2 SIP Provisions from Title V Permit
No. 44-05001 Significant Modification issued
08-15-19 (pages 108 and 109 of permit)**

ID	Name
102	NO 2 ELECTRIC ARC FURNACE (LECTROMELT)
104A	NO 4A ELECTRIC ARC FURNACE (TC-LECTROMELT) 75/66.5T, 56MVA
204	AFM 8141 WALKING BEAM
401	CDFS 8121 ROTARY HEARTH
404	ROTARY AUSTENITIZING FURNACE
601	NON- PRODUCTION VOC USAGE

VII. ADDITIONAL REQUIREMENTS.

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Alternative RACT proposal and petition for alternative compliance schedule.

The following is a case-by-case RACT 2 determination for the indicated sources, pursuant to 25 Pa. Code Section 129.99:

I. Source 102 (#2 EAF) and Source 104A (#4A EAF):

(a) The permittee shall maintain and adhere to an operation and maintenance plan for Sources 102 and 104A, which shall address good operation and maintenance practices for the minimization of NO_x and VOC emissions, including measures to minimize the ambient air infiltration into the direct evacuation hoods.

(b) The permittee shall maintain records of any maintenance or modifications performed on Sources 102 or 104A.

(c) The permittee shall calculate and record the actual annual NO_x and VOC emissions using appropriate emissions factors from U.S. EPA Publication AP-42 or appropriate alternative emission factors based on PADEP review, coupled with appropriate operational and thruput data.

**SECTION E. Source Group Restrictions.**

(d) The permittee shall maintain written documentation of the items in (a)-(c) above for five years. The records shall be made available to the Department upon written request pursuant to 25 Pa. Code §129.100(d) and (i).

II. Source 204 (AFM 8141 Walking Beam Furnace), Source 401 (CDFS 8121 Rotary Hearth Furnace) and Source 404 (Rotary Austenitizing Furnace):

(a) Sources 204, 401 and 404 shall each be equipped with low-NOx burners.

(b) Sources 204, 401 and 404 shall combust only natural gas.

(c) The permittee shall maintain and adhere to an operation and maintenance plan for each of Sources 204, 401 and 404, which shall address good operation and maintenance practices for the minimization of NOx and VOC emissions.

(d) The permittee shall maintain records of any maintenance or modifications performed on Sources 204, 401 and 404.

(e) The permittee shall calculate and record the actual annual NOx emissions from Sources 204, 401 and 404 using appropriate emissions factors from U.S. EPA Publication AP-42 or appropriate alternative emission factors based on PADEP review, coupled with appropriate operational and throughput data. Actual fuel use may be monitored at a common natural gas meter and pro-rated based upon maximum heat input of connected furnaces. [Note: Upon approval of this provision by EPA as a SIP revision, this condition (e) shall supersede Condition 5 in RACT 1 Operating Permit 44-2001, to the extent that Condition 5 would apply to Sources 204 or 401.]

(f) The permittee shall maintain written documentation of the items in (c)-(e) above for five years. The records shall be made available to the Department upon written request pursuant to 25 Pa. Code §129.100(d) and (i).

III. Non- Production VOC Usage (Source 601)

a.) The permittee shall minimize the VOC emissions from the Source 601 Non- Production VOC Usage in the following manner:

i. All solvents shall be stored and transported in closed containers or pipes.

ii. All rags containing solvent shall be placed into closed storage containers for storage.

iii. All rags containing solvent shall be placed into sealed containers and disposed of.

iv. Spills of materials containing VOC shall be minimized and shall be cleaned up immediately with cleaning cloths or alternative approved methods that will minimize the evaporation of VOC into the atmosphere.

v. Minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent, and all spent solvent is captured in closed containers.

vi. Any products used which are subject to 25 Pa. Code 130 - Standards for Products, or to 40 CFR Part 59 Subpart E - National Volatile Organic Compound Emission Standards for Aerosol Coatings, or to 40 CFR Part 59 Subpart D - National Volatile Organic Compound Emission Standards for Architectural Coatings, shall comply with the requirements of those regulations, as applicable.

b.) The permittee shall record the quantity and identity of all VOC-containing materials used in Source 601 on the various sources on a monthly basis. These records shall be maintained and shall be made part of the permittee's annual "AIMS" report to the Department. The records shall be compiled into a monthly and 12-month rolling total format.

c.) Manufacturer supplied VOC data sheets for all coatings and cleaning agents applied within the most recent five (5) years shall be maintained at the facility and be made available to the Department at any time upon request.

NOTE: The above conditions shall supersede the SIP-ed RACT 1 requirements for any RACT 1 sources that are part of this source group, upon approval by EPA as a SIP revision.