



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

DEC 10 2015

REPLY TO THE ATTENTION OF:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Title V renewal permit, permit number P0103991, for the Timken Steel – Faircrest Steel Plant, located in Canton, Ohio. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

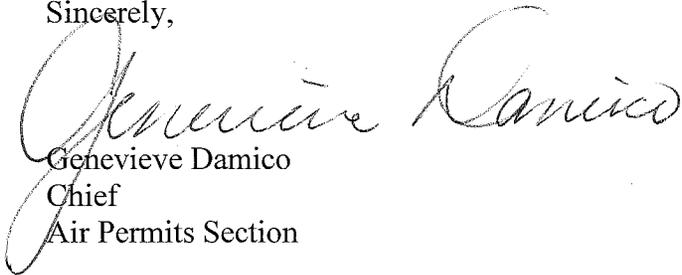
1. Page 27 of the draft permit lists the Scrap Management Plan (SMP) as a compliance method for the mercury limits for the electric arc furnace (EAF) (EUP102). The draft permit's statement of basis lists the SMP as being best available control technology for volatile organic compounds for the EAF. The terms SMP are applicable requirements and must be included in the permit. The August 17, 2010, Title V petition order for Alliant Energy's WPL Edgewater Generating Station in Wisconsin clarifies the expectation that a plan (i.e. SMP, Fugitive Dust Plan, Startup, Shutdown, Malfunction Plan) needs to be in the permit and permit application because each Title V permit must include limits including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance. The permit must be revised to include the terms of the SMP.
2. Condition f on page 29 of the draft permit says that compliance with the mercury limit for the EAF shall be assumed if the source complies with the Part 63, Subpart YYYYYY applicable requirements. If the Ohio Environmental Protection Agency is using the option to streamline requirements under White Paper 2, the permit record must be clear on how the Subpart YYYYYY requirements will demonstrate compliance with the mercury limit. Otherwise, the permit must include the appropriate monitoring, testing, record keeping and reporting to ensure compliance with the mercury emission limit.
3. Many of the emission units in the draft permit contain citations of the authority from an Administrative Permit Modification to a permit to install (PTI) "to be issued", i.e. page

65, emission unit P127 – Soaking Pit #10 has the following language: “Administrative Permit Modification to PTI 15-01339 to be issued”. Is this a situation where the permit modifications been issued and the permit language in question contains typographical errors? If so, please remove the “to be issued” permit language. If not, permit changes should first be made in PTI permits and then incorporated into a Title V permit.

4. Page 31 of the draft permit contains operational restrictions including a combined limit of the quantity of used tires (12,930 tons per year) burned in the EAFs at both the Faircrest Steel Plant and the Harrison Steel Plant, as well as a combined limit of 419 tons per year of sulfur dioxide (SO<sub>2</sub>) on a rolling 12-month summation basis when burning used tires from both steel plants’ EAFs. The PTI that set this limit suggests that both the Faircrest Steel Plant and the Harrison Steel Plant are a single source. Yet the statement of basis is not clear on this point, nor are the implications of the two facilities being a single source discussed. Please update the permit record on this point.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Richard Angelbeck at (312) 886-9698.

Sincerely,



Genevieve Damico  
Chief  
Air Permits Section