John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

10/7/2013

Certified Mail

MICHAEL MILLER
MONOGRAM METALS, INC.
60800 LEYSHON DR
P.O. BOX 125
BYESVILLE, OH 43723

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0630000105
Permit Number: P0107634
Permit Type: Renewal
County: Guernsey

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-SEDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
MONOGRAM METALS, INC.

Facility ID:	0630000105
Permit Number:	P0107634
Permit Type:	Renewal
Issued:	10/7/2013
Effective:	10/7/2013
Expiration:	10/7/2023

Division of Air Pollution Control
Permit-to-Install and Operate
for
MONOGRAM METALS, INC.

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Authorization

Facility ID:	0630000105
Application Number(s):	A0041288
Permit Number:	P0107634
Permit Description:	Renewal PTIO for P901, a galvanizing line for steel.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	10/7/2013
Effective Date:	10/7/2013
Expiration Date:	10/7/2023

Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

MONOGRAM METALS, INC.
60800 LEYSHON DRIVE
BYESVILLE, OH 43723

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0107634
Permit Description: Renewal PTIO for P901, a galvanizing line for steel.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P901**
Company Equipment ID:	Galv. Steel Strip
Superseded Permit Number:	06-06957
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement.Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is takenby Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

2. The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule (40 CFR Part 63, Subpart WWWWWW) that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. P901, Galv. Steel Strip

Operations, Property and/or Equipment Description:

Galvanizing zinc pot line with maximum operating rate of 0.35 tons zinc used/hour and 11,000 lbs/hr steel processed; PE is controlled by a wet a.k.a. primary scrubber with a capture of 90% and a control of 98%; Acid vapors are controlled with a fugitive a.k.a. horizontal packed bed scrubber/absorber with a capture of 90% and a control of 95% (Supersedes PTI 06-06957, issued 01/14/2003)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(A)(3) (as established in PTI 06-06957, issued 01/14/2003)	<u>Stack Emissions:</u> Particulate emissions (PE) from the wet primary scrubber exhaust stack shall not exceed 0.37 lb/hr and 1.62 tons/yr (TPY). Hydrogen chloride (HCl) emissions from the fugitive horizontal packed bed scrubber/absorber exhaust stack shall not exceed 0.06 lb/hr and 0.26 TPY. Visible PE from any stack serving this emissions unit shall not exceed 10% opacity as a 6-minute average.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Fugitive Emissions: Total fugitive PE shall not exceed 10.6 tons/yr. Total fugitive HCl emissions shall not exceed 0.83 ton/yr. See b)(2)a.-d. below.
b.	OAC Rule 3745-17-07(A) OAC Rule 3745-17-11(B)(2)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC Rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee shall employ best available control measures on the galvanizing line for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain hoods to capture fugitive emissions and vent emissions to scrubbers to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The emissions from the acid dip tank, preheat oven and zinc pot shall be vented to the wet primary scrubber with a 90% capture and a 98% control efficiency at all times when the emissions unit is in operation.

c. The emissions from the pickle tank, flux tank, acid tank, waste strip are, batch treatment, galvanizing steel strip and washer shall be vented to the fugitive horizontal packed bed scrubber/absorber with a 90% capture and a 95% control efficiency at all times when the emissions unit is in operation.

d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC Rule 3745-31-05.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from any stack serving this emissions unit stack. The presence or absence of any visible emissions

from each stack shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the following:

a. the pressure drop across the wet primary scrubber (in pounds per square inch, gauge),

b. the liquid flow rate (in gallons per minute) for both the wet primary scrubber and the fugitive horizontal packed bed scrubber/absorber, and

c. the liquid pH during operation of this emissions unit, including periods of startup and shutdown for both the wet primary scrubber and the fugitive horizontal packed bed scrubber/absorber.

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

(3) The permittee shall record the following on a daily basis:

a. the pressure drop across the wet primary scrubber (in pounds per square inch, gauge),

b. the liquid flow rate (in gallons per minute) for both the wet primary scrubber and the fugitive horizontal packed bed scrubber/absorber, and

c. the liquid pH for both the wet primary scrubber and the fugitive horizontal packed bed scrubber/absorber

(4) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the wet primary scrubber, that shall be maintained in order to demonstrate compliance, shall not be less than 30 pounds per square inch (gauge).

(5) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rates, that shall be maintained in order to demonstrate compliance, shall not be less than 46 gallons per minute.

(6) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pH of the scrubber liquids, that shall be maintained in order to demonstrate compliance, is at or above 7.5 S.U.

(7) Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop of the wet primary scrubber, flow rate for both the wet primary scrubber and the fugitive horizontal packed bed scrubber/absorber, and pH readings for both the wet primary scrubber and the fugitive horizontal packed bed scrubber/absorber immediately after the corrective action as implemented; and,

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC Rule 3745-18-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the pressure drop, liquid flow rate, and pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop, liquid flow rate, or pH based upon information obtained during future performance tests

that demonstrate compliance with the allowable PE and hydrogen chloride emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

PE from the wet primary scrubber exhaust stack shall not exceed 0.37 lb/hr and 1.62 TPY.

Applicable Compliance Method:

The lb/hr emissions limitation was established by the following one time calculation using the emission factor submitted by the permittee, the maximum production rate, and the design capture and control efficiency for the primary scrubber (the permittee has indicated that all stack particulate emissions are attributable to the primary scrubber).

lb/hr PE = EF x Maximum Production Rate x Capture Efficiency x (1-Control Efficiency)

Emission Factor (EF) = 0.001852 lb PE/lb steel galvanized, as submitted in the application, calculated from stack test information

Maximum Production Rate = 11,000 lbs/hr steel galvanized, as submitted in the application

Capture Efficiency = 90%

Control Efficiency = 98%

0.001852 lb PE/lb x 11,000 lbs/hr x (0.9) x (1-0.98) = 0.367 lb PE/hr

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60

"Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual emissions limitation was established by the following one time calculation using the hourly emissions rate multiplied by 8,760 hrs/yr and divided by 2,000 lbs/ton.

(0.37 lb/hr)*(8,760 hrs/yr)/(2,000 lbs/ton) = 1.62 TPY

b. Emissions Limitation:

HCl emissions from the fugitive horizontal packed bed scrubber/absorber exhaust stack shall not exceed 0.06 lb/hr and 0.26 TPY.

Applicable Compliance Method:

The lb/hr emissions limitation was established by the following one time calculation using the emission factor based on a mass balance submitted by the permittee, the maximum production rate, and the design capture and control efficiency for the fugitive scrubber (the permittee has indicated that all stack hydrogen chloride emission are attributable to the fugitive scrubber).

lb/hrHCl = EF x Max. Production Rate x Capture Efficiency x (1-Control Efficiency)

Emission Factor (EF) = 0.0001188 lb hydrogen chloride/lb steel galvanized based on mass balance, as submitted in the application, calculated from engineering study data

Maximum Production Rate = 11,000 lbs/hr steel galvanized, as submitted in the application

Capture Efficiency = 90%, as submitted in the application

Control Efficiency = 95%, as submitted in the application

0.0001188 lb hydrogen chloride/lb steel galvanized x 11,000 lbs/hr x (0.9) x (1-0.95) = 0.06 lb/hr

If required, the permittee shall demonstrate compliance with the mass emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 26.

The annual emissions limitation was established by the following one time calculation using the hourly emissions rate multiplied by 8,760 hrs/yr and divided by 2,000 lbs/ton.

(0.06 lb/hr)*(8,760 hrs/yr)/(2,000 lbs/ton) = 0.26 TPY

c. Emissions Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

d. Emissions Limitation:

Total fugitive PE shall not exceed 10.6 tons/yr.

Applicable Compliance Method:

Compliance with the tons/yr emission limitation shall be demonstrated by the following one time calculation using the emission factor submitted by the permittee, the maximum annual production, and the design capture and control efficiency for the primary scrubber.

Total PE (tons/yr) = EF x Max. Annual Production x (1-Overall Control Efficiency) x 0.0005 ton/lb

Emission Factor (EF) = 0.001852 lb PE/lb steel galvanized, as submitted in the application, calculated from stack test information

Maximum Annual Production = 11,000 lbs/hr steel galvanized (as submitted in the application) x 8760 hrs/yr = 96,360,000 lbs/yr

Overall Control Efficiency = Capture Efficiency x Control Efficiency = 0.9 x 0.98 = 0.882 (88.2%)

0.001852 lb PE/lx steel galvanized x 96,360,000 lbs/yr x (1-0.882) x 0.0005 ton/lb = 10.53 tons PE/yr

e. Emissions Limitation:

Total fugitive HCl emissions shall not exceed 0.83 ton/yr.

Applicable Compliance Method:

The ton/yr emissions limitation was established by the following one time calculation using the emission factor based on a mass balance submitted by the permittee, the maximum annual production, and the design capture and control efficiency for the scrubber.

Total hydrogen chloride (ton/yr) = EF x. Max. Annual Production x (1-Overall Control Efficiency) x 0.0005 ton/lb

Emission Factor (EF) = 0.0001188 lb hydrogen chloride / lb steel galvanized, as submitted in the application, calculated from engineering study data

Maximum Annual Production = 11,000 lbs/hr steel galvanized (as submitted in the application) x 8,760 hrs/yr = 96,360,000 lbs/yr

Overall Control Efficiency = Capture Efficiency X Control Efficiency = 0.9 x 0.95 = 0.855 (85.5%)

0.0001188 lb hydrogen chloride / lb steel galvanized x 96,360,000 lbs/yr x (1-0.855) x 0.0005 ton/lb = 0.83 ton/yr

g) Miscellaneous Requirements

(1) None.