



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
BUTLER COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-05614**

**Fac ID: 1409070344**

**DATE: 2/24/2005**

Worthington Steel Company  
Jack Woodward  
350 Lawton Ave  
Monroe, OH 45050

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

cc: USEPA

HCDES



**Permit To Install  
Terms and Conditions**

**Issue Date: 2/24/2005  
Effective Date: 2/24/2005**

**FINAL PERMIT TO INSTALL 14-05614**

Application Number: 14-05614  
Facility ID: 1409070344  
Permit Fee: **\$200**  
Name of Facility: Worthington Steel Company  
Person to Contact: Jack Woodward  
Address: 350 Lawton Ave  
Monroe, OH 45050

Location of proposed air contaminant source(s) [emissions unit(s)]:

**350 Lawton Ave  
Monroe, Ohio**

Description of proposed emissions unit(s):

**The facility has proposed the use of organic materials in the dry lube line.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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**Worthington Steel Company**  
**PTI Application: 14-05614**  
**Issued: 2/24/2005**

**Facility ID: 1409070344**

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**PTI Application: 14-05614**  
**Issued: 2/24/2005**

**Facility ID: 1409070344**

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	25.0

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P006 - Dry Lube/Coil Coating Line w/ Infrared Drying Oven	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 27.5 pounds per hour and 25.0 tons per year.
	OAC rule 3745-21-09(E)	See terms A.2.a. and B.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(E) and 40 CFR Part 60, Subpart TT.
	40 CFR Part 60, Subpart TT	The VOC content of the coatings shall not exceed 2.6 pounds VOC per gallon of coating, excluding water and exempt solvents based upon a daily volume weighted average.
		The VOC content of the coatings shall not exceed 0.28 kilogram VOC per liter of coating solids applied for each calendar month based upon a monthly volume weighted average.

**2. Additional Terms and Conditions**

- 2.a The VOC content as applied, of each coating employed shall not exceed 0.5 pound of

VOC per gallon of coating as applied, including water and exempt solvents.

- 2.b The hourly emissions limitation outlined in Section A.1 are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records are required to demonstrate compliance with this limit.
- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations, VOC content limitations and the coating usage limitation.
- 2.d The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

## **B. Operational Restrictions**

- 1. The maximum annual coating usage for this emissions unit shall not exceed 100,000 gallons as applied, including water and exempt solvents. This limitation shall apply only to coatings that contain volatile organic compounds.

## **C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information on a daily basis for the purpose of determining the daily volume weighted average VOC content for all coatings employed in this emissions unit:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content (excluding water and exempt solvents) in pounds per gallon of coating for each coating employed.
  - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
  - d. The daily volume-weighted average VOC content, as applied, for all coatings. The daily volume weighted average shall be calculated by multiplying the VOC content in line (b) by the usage amount contained in line (c) for all coatings employed during that day. The summation of these values should then be divided by the total gallons of coatings employed during that day.

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification number of each coating, as applied.
  - b. The VOC content of each coating, including water and exempt solvents, as applied.
  - c. The total volume in gallons, including water and exempt solvents, of each coating employed.
  - d. The total volume in gallons, including water and exempt solvents, of all coatings employed.

Emissions Unit ID: P006

- e. The kilograms of VOC per liter of coating solids applied for each coating.
  - f. The kilograms of VOC per liter of coating solids applied based upon a monthly volume weighted average for all coatings employed.
  - g. The total VOC emissions in pounds or tons (b x c).
3. The permit to install for emissions unit P006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: N-Ethylmorpholine

TLV (ug/m<sup>3</sup>): 23,550

Maximum Hourly Emission Rate (lbs/hr): 0.55

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m<sup>3</sup>): 15

MAGLC (ug/m<sup>3</sup>): 561

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the

application and modeled; and

- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings(i.e, the VOC content limit in term and condition A.2.a.) The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which identify any exceedances of the annual coating usage limitation in term and condition B.1., as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
3. The permittee shall also submit annual reports to the Hamilton County Department of Environmental Services which specify the total VOC emissions from this emissions unit for the

Emissions Unit ID: **P006**

previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all periods of time during which any coating employed in this emissions unit exceeds the 0.28 kilogram VOC per liter of coating solids applied for each calendar month limitation.

If no exceedances occurred, the permittee shall state so in the report. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the daily volume-weighted average VOC content of 2.6 pounds VOC per gallon of coating, minus water and exempt solvents, exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
6. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. actual start-up date (within 15 days after such date);
  - d. date of performance testing (if required, at least 30 days prior to testing); and
  - e. an initial compliance report with the weighted average of the VOC content of the coatings used during a period of one calendar month (within 60 days after startup).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
P. O. Box 163669  
Columbus, Ohio 43216-3669

and

Hamilton County Department of Environmental Services  
250 William Howard Taft Road  
Cincinnati, Ohio 45219

### **E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
27.5 pounds per hour VOC  
  
Applicable Compliance Method:  
  
The hourly VOC emission rate is based on the emission unit's potential to emit. The potential to emit was based on the usages and information provided in the application for PTI 14-05614, received on August 31, 2004.
  - b. Emission Limitation:  
  
25.0 TPY VOC  
  
Applicable Compliance Method:  
  
Compliance with the annual VOC emission limitation in term and condition A.1. shall be based upon the record keeping requirements as specified in term and condition C.2.
  - c. Emission Limitation:  
  
0.28 kilogram VOC per liter of coating solids applied for each calendar month.  
  
Applicable Compliance Method:  
  
Compliance shall be determined by the methods outlined in 40 CFR 60.463(c)(1) and the record keeping in term C.2.
2. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings. If, pursuant to Method 24, 40 CFR, Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of

the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

3. Compliance with the VOC content limitation in term and condition A.1. shall be determined by the record keeping requirements specified in term and condition C.1.
3. Compliance with the VOC content limitation in term and condition A.2.a. shall be determined by the record keeping requirements specified in term and condition C.2.
4. Compliance with the annual coating usage limitation in term and condition B.1 shall be demonstrated by the record keeping in term and condition C.2.

#### **F. Miscellaneous Requirements**

None