



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

2/9/2016

Mr. Timothy Harvey
ALLIANCE TUBULAR PRODUCTS LLC - Alliance Plant
Copperleaf Centre
6051 Wallace Road Ext., Suite 200
Wexford, PA 15090

Certified Mail

| | |
|----|------------------------------------|
| No | TOXIC REVIEW |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| No | 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: 1576010407
Permit Number: P0115940
Permit Type: Initial Installation
County: Stark

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**
- **What should you do if you notice a spill or environmental emergency?**

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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Canton City Health Department at (330)489-3385 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Canton



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for**

ALLIANCE TUBULAR PRODUCTS LLC - Alliance Plant

| | |
|----------------|----------------------|
| Facility ID: | 1576010407 |
| Permit Number: | P0115940 |
| Permit Type: | Initial Installation |
| Issued: | 2/9/2016 |
| Effective: | 2/9/2016 |
| Expiration: | 2/9/2026 |



Division of Air Pollution Control
Permit-to-Install and Operate
for
ALLIANCE TUBULAR PRODUCTS LLC - Alliance Plant

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Authorization

Facility ID: 1576010407
Application Number(s): A0049470
Permit Number: P0115940
Permit Description: Initial installation permit for strip brush controlled by a baghouse, that was originally installed in 1973.
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 2/9/2016
Effective Date: 2/9/2016
Expiration Date: 2/9/2026
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

ALLIANCE TUBULAR PRODUCTS LLC - Alliance Plant
640 KEYSTONE STREET
Alliance, OH 44601

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

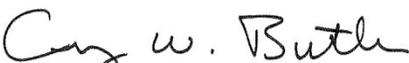
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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


Craig W. Butler
Director



Final Permit-to-Install and Operate
ALLIANCE TUBULAR PRODUCTS LLC - Alliance Plant
Permit Number: P0115940
Facility ID: 1576010407
Effective Date: 2/9/2016

Authorization (continued)

Permit Number: P0115940

Permit Description: Initial installation permit for strip brush controlled by a baghouse, that was originally installed in 1973.

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

| | |
|-----------------------------------|--------------------|
| Emissions Unit ID: | P016 |
| Company Equipment ID: | 4 Mill Strip Brush |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install and Operate
ALLIANCE TUBULAR PRODUCTS LLC - Alliance Plant
Permit Number: P0115940
Facility ID: 1576010407
Effective Date: 2/9/2016

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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 taken by 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 of this permit 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 [DO/LAA] 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 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 emission 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.

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.



Final Permit-to-Install and Operate
ALLIANCE TUBULAR PRODUCTS LLC - Alliance Plant
Permit Number: P0115940
Facility ID: 1576010407
Effective Date: 2/9/2016

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.



Final Permit-to-Install and Operate
ALLIANCE TUBULAR PRODUCTS LLC - Alliance Plant
Permit Number: P0115940
Facility ID: 1576010407
Effective Date: 2/9/2016

C. Emissions Unit Terms and Conditions



1. P016, #4 Mill Strip Brush

Operations, Property and/or Equipment Description:

#4 Mill Strip Brush used in the removal of surface rust/scale from flat rolled carbon steel. Particulate emissions are controlled by a Torit dust collector exhausting outside.

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 3745-17-07(A)(1) | Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. |
| b. | OAC rule 3745-17-11(B)(1) | Particulate emissions (PE) shall not exceed 0.697 pounds per hour from the stack serving this emission unit. See c)(1). |
| c. | OAC rule 3745-17-08 | Exempt from the fugitive dust requirements of this rule pursuant to paragraph (A)(1) of this rule because the facility is not located in an Appendix A Area identified in this rule. |
| d. | OAC rule 3745-17-07(B) | Exempt from the fugitive visible particulate emissions requirements of this rule pursuant to paragraph (B)(11)(e) of this rule because the facility is not located |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| | | in an Appendix A Area identified in OAC rule 3745-17-08. |
| e. | OAC rule 3745-31-05(A)(3) | Exempt from the best available technology requirements of this rule pursuant to paragraph (A)(3)(a)(i) of this rule since this source was installed prior to 01/01/1974. |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions 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 emissions incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee shall maintain the baghouse in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s). In the event the baghouse is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the baghouse. These documents shall be maintained at the facility.
- (3) The permittee shall conduct periodic inspections of the baghouse to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.

The permittee shall document each inspection (periodic and annual) of the baghouse and shall maintain the following information:

- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.
- (4) The permittee shall maintain records that document any time periods when the baghouse was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the baghouse was not operated according to the manufacturer's recommendations.
- 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.
 - (2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from the stack serving this emission unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.697 pounds per hour.

Applicable Compliance Method:

The particulate emission limitation established shall be the more stringent of the two allowable emission rates determined by Table I or Figure II of OAC rule 3745-17-11.

The uncontrolled mass rate of emissions (UMRE) shall be used to determine the allowable emission limitation from Figure II. The UMRE was calculated using an emission factor of 1.42 pound filterable particulate per hour which was produced from the permittee measuring the amount of baghouse dust collected during a known time as follows:

150 lbs of dust was in the baghouse collection bin after 117 hours of operation.

The baghouse is estimated to have a control efficiency of 95%

The strip brush has a collection hood which is estimated to have a capture efficiency of 95%

$UMRE = (\text{amount of dust in baghouse collection bin in lbs/hr}) \div [(\text{capture efficiency}) \times (\text{control efficiency})]$

$UMRE = (150 \text{ lbs}/117 \text{ hrs}) \div [(0.95) \times (0.95)] = (1.282) \div (0.9025) = 1.42 \text{ lbs/hr}$

Per OAC rule 3745-17-11(A)(2)(a)(ii), Figure II shall not apply since the UMRE is less than 10 lbs/hr.



Table I uses the process weight rate (P) of all materials introduced that may cause particulate emissions. Steel coil is feed into the strip brush at 144,000 lbs/hr. However, only the rust/scale layer on this coil causes particulate emissions. The quantity of rust/scale was determined by estimating that 1% of the quantity becomes airborne and is equal to the UMRE. Therefore, the total rust/scale layer on this coil is $1.42 \div 0.01 = 142$ lbs/hr, which is 0.09% of the total steel coil rate. Therefore, $P = 142$ lb/hr = 0.071 tons/hr. Using Table I, the allowable emission rate (E) in pounds per hour is determined by the following equation and was established as the emission limitation:

$$E = 4.10 \times (P)^{0.67} = 4.10 \times (0.071)^{0.67} = 0.697 \text{ lb PE /hr}$$

Since the emission limitation of 0.697 lbs/hr is less than the UMRE from the strip brush, a particulate control device is required to be used to meet the emission limitation. The permittee has chosen to install a Torit Dust Collector with 9,450 cfm flow-rate with an estimated 95% control efficiency. The dust collector captures the emissions from the strip brush with a collection hood with a capture efficiency estimated at 95%. Based on this, the expected controlled stack emission rate is:

$$(1.42 \text{ lbs/hr PE uncontrolled}) \times (0.95_{\text{capture}}) \times (1 - 0.95_{\text{control}}) = 0.067 \text{ lbs/hr}_{\text{stack}}$$

$$0.067 \text{ lbs/hr}_{\text{stack}} < 0.697 \text{ lbs/hr}_{\text{stack emission limitation}}$$

Therefore, provided the permittee has continued to operate the dust collector in accordance with manufacturer recommendations during all times the emissions unit is operated, compliance shall be achieved with the emission limitation.

Note: There is a portion of fugitive emissions from this emission unit that is not included in the emission limitation. The fugitive emissions are:

$$(1.42 \text{ lbs/hr PE uncontrolled}) \times (1 - 0.95_{\text{capture}}) = 0.071 \text{ lbs/hr}_{\text{fugitive}}$$

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC Rule 3745-17-03(B)(10).

- g) Miscellaneous Requirements
 - (1) None.