



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

2/29/2016

Certified Mail

ELAINE VETH  
 WORTHINGTON STEEL  
 6303 COUNTY RD 10  
 DELTA, OH 43515

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0326000076  
 Permit Number: P0118922  
 Permit Type: Administrative Modification  
 County: Fulton

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Fulton County Expositor. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northwest District Office  
 347 North Dunbridge Road  
 Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
 Ohio EPA-NWDO; Michigan; Indiana; Canada





## Response to Comments

Facility ID:	0326000076
Facility Name:	WORTHINGTON STEEL
Facility Description:	Primary Metal Products, n.e.c.
Facility Address:	6303 COUNTY RD 10 Delta, OH 43515 Fulton County
Permit:	P0118922, Permit-To-Install and Operate - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Fulton County Expositor on 11/12/2015. The comment period ended on 12/12/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

- a. **This permit will be issued draft again. Any comments shared between the company and Ohio EPA have been included in the attachments section entitled e-mails regarding facility comments to 11/4/15 draft issuance (1st draft issuance). An updated response to comments will be generated based on second draft issuance of this permit.**



## PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: [HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

### Draft Air Pollution Permit-to-Install and Operate Administrative Modification WORTHINGTON STEEL

6303 COUNTY RD 10,,Delta, OH 43515

ID#:P0118922

Date of Action: 2/29/2016

Permit Desc:Administrative modification to PTI 03-8911, issued July 22, 1998 and PTI 03-16237, issued November 16, 2004 to allow for change in HCl and PE allowables, change in synthetic minor restrictions for limiting HCl and addition of synthetic minor restrictions for VOC emissions associated with emissions units P003, P007, & P011..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461





**DRAFT**

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

Facility ID:	0326000076
Permit Number:	P0118922
Permit Type:	Administrative Modification
Issued:	2/29/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





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

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**Draft Permit-to-Install and Operate**

WORTHINGTON STEEL

**Permit Number:** P0118922

**Facility ID:** 0326000076

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0326000076  
Application Number(s): A0053447  
Permit Number: P0118922  
Permit Description: Administrative modification to PTI 03-8911, issued July 22, 1998 and PTI 03-16237, issued November 16, 2004 to allow for change in HCl and PE allowables, change in synthetic minor restrictions for limiting HCl and addition of synthetic minor restrictions for VOC emissions associated with emissions units P003, P007, & P011.  
Permit Type: Administrative Modification  
Permit Fee: \$650.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 2/29/2016  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

WORTHINGTON STEEL  
6303 COUNTY RD 10  
Delta, OH 43515

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, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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



## Authorization (continued)

Permit Number: P0118922

Permit Description: Administrative modification to PTI 03-8911, issued July 22, 1998 and PTI 03-16237, issued November 16, 2004 to allow for change in HCl and PE allowables, change in synthetic minor restrictions for limiting HCl and addition of synthetic minor restrictions for VOC emissions associated with emissions units P003, P007, & P011.

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

<b>Emissions Unit ID:</b>	<b>K001</b>
Company Equipment ID:	K001
Superseded Permit Number:	03-16237
General Permit Category and Type:	Not Applicable

**Group Name: Chrome application & Oilers**

<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	P003
Superseded Permit Number:	03-8911
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P007</b>
Company Equipment ID:	P007
Superseded Permit Number:	03-8911
General Permit Category and Type:	Not Applicable

**Group Name: Pickling Line & Storage Tanks**

<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	P002
Superseded Permit Number:	03-8911
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T001</b>
Company Equipment ID:	T001
Superseded Permit Number:	03-8911
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T002</b>
Company Equipment ID:	T002
Superseded Permit Number:	03-8911
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T003</b>
Company Equipment ID:	T003
Superseded Permit Number:	03-8911
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T004</b>
Company Equipment ID:	T004
Superseded Permit Number:	03-8911
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T005</b>
Company Equipment ID:	T005
Superseded Permit Number:	03-8911
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
WORTHINGTON STEEL  
**Permit Number:** P0118922  
**Facility ID:** 0326000076  
**Effective Date:** To be entered upon final issuance

## **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 Ohio EPA DAPC, Northwest 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 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.



**Draft Permit-to-Install and Operate**  
WORTHINGTON STEEL  
**Permit Number:** P0118922  
**Facility ID:** 0326000076  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



**Draft Permit-to-Install and Operate**

WORTHINGTON STEEL

**Permit Number:** P0118922

**Facility ID:** 0326000076

**Effective Date:** To be entered upon final issuance

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.



**Draft Permit-to-Install and Operate**  
WORTHINGTON STEEL  
**Permit Number:** P0118922  
**Facility ID:** 0326000076  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. K001**

**Operations, Property and/or Equipment Description:**

Acrylic Chrome Conversion Application Line

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. d)(3)

(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. b)(1)b., b)(2)c., c)(1), d)(2), e)(1), and f)(1)c.

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)	10.47 lbs VOC/hr& 28.60 tons VOC/yr, from emissions unit K001  See b)(2)a., b)(2)b., and b)(2)d.
b.	OAC rule 3745-31-05(D)	See b)(2)c. and c)(1)
c.	OAC rule 3745-21-09(U)(1)c.	3.5 lbs volatile organic compound per gallon excluding water and exempt solvents, for an extreme performance coating

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) has been determined to be compliance with the terms and conditions of this permit.

b. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D).



- c. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V and PSD requirements. The federally enforceable emission limitation is based on the operational restriction contained in c)(1) of this permit:
  - i. 87 tons VOC per rolling, 12-month period based on material usage restrictions for emissions units P003, P007, & K001, combined.
- d. The requirements of OAC rule 3745-31-05(A)(3) shall also include compliance with OAC rule 3745-21-09(U)(1)(c).

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of VOC-containing materials employed in emissions units P003, P007, & K001, combined, is limited by the following equation:

$$\sum_{i=1}^M [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 87$$

$$M=1 \quad i=1$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = VOC content in pounds per gallon of each material employed

G<sub>i</sub> = Gallons used of each VOC containing material for the rolling 12-month period

n = total number of unique VOC containing materials employed in emission units P003, P007, & K001

Compliance with the annual restriction on the amount of VOC containing materials employed shall be based upon a rolling, 12-month summation.

Emissions units P003, P007 & K001 have been in operation for more than 12 months and, such the facility has existing usage and VOC emissions records for these operations in lieu of establishing monthly restrictions for the first year of operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit :
  - a. the company name and identification for each VOC containing material employed;
  - b. the volume, in gallons, of each VOC containing material employed;
  - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon [the VOC content excluding water and exempt solvents

shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for  $C_{voc2}$ ];

- d. the VOC content of each VOC containing material employed, in pounds per gallon, as applied;
  - e. the VOC emission rate, in pounds, for each VOC containing material employed [d)(1)b. x d)(1)d.];
  - f. the total VOC emission rate from all VOC containing materials employed [summation of d)(1)e.], in pounds or tons; and
  - g. the annual year-to-date VOC emissions, in tons, from all VOC containing materials employed (summation of d)(1)f. for each calendar month to date from January to December).
- (2) The permittee shall calculate and maintain monthly records of the VOC emissions and the rolling, 12-month emissions of VOC for emissions units P003, P007, & K001, combined.
- (3) The permit to install for this emissions unit (K001) 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" ("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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 4-Ethylmorpholine

TLV (mg/m<sup>3</sup>): 24

Maximum Hourly Emissions Rate (lbs/hr): 10.47

Predicted 1-Hour Maximum Ground Level Concentration (ug/m<sup>3</sup>): 156

MAGLC(ug/m<sup>3</sup>): 571

Physical changes to or changes in the method of operation of the emissions until after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 Toxics Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying 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 toxic air contaminant listed in OAC rule 3734-114-01 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 compositions of the materials, or use of new materials that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01 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 evaluation to determine that the changed emissions unit will still 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. where 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.

e) **Reporting Requirements**

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. all exceedances of the rolling, 12-month VOC emission limitation of 87 tons, for emissions P003, P007, & K011, combined;

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
- (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:  
10.47 lbs VOC/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit\* for this emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this emissions limitation.

\*The potential to emit is based on a maximum hourly gallon usage rate of 74.8 gallons per hour and a maximum VOC content of 0.14 lb/gallon.

- b. Emission Limitation:  
28.60 tons VOC/yr

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements contained in section d)(1) of this permit.

- c. Emission Limitation:  
87 tons of VOC per rolling, 12-month period for emissions P003, P007, & K001, combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements contained in section d)(2) of this permit.

- d. Emission Limitation:  
3.5 lbs volatile organic compound per gallon excluding water and exempt solvents, for an extreme performance coating

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements contained in section d)(1) of this permit.

- g) Miscellaneous Requirements

- (1) None.



**2. Emissions Unit Group -Chrome application & Oilers: P003,P007,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P003	Pickle Line Rollcoat Metal Treatment Operation (Oiler)
P007	Galvanize Line Electrostatic Metal Treatment - Oiler

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. d)(2)

(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. b)(1)b., b)(2)c., c)(1), d)(1) and f)(1)c.

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)	53.9 lbs volatile organic compounds (VOC)/hr, from emissions unit P003  21.88 lbs VOC/hr, from emissions unit P007
b.	OAC rule 3745-31-05(D)	See b)(2)c. and c)(1)

(2) Additional Terms and Conditions

a. Best Available Technology (BAT) has been determined to be compliance with the terms and conditions of this permit.

b. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D).

c. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V and PSD



requirements. The federally enforceable emission limitation is based on the operational restriction contained in c)(1) of this permit:

- i. 87 tons VOC per rolling, 12-month period based on material usage restrictions for emissions units P003, P007, & K001 combined.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of VOC containing materials employed in emissions units P003, P007, & K001 combined, is limited by the following equation:

$$\sum_{i=1}^n [(V_i)(G_i)] \div 2000 \text{ lbs/ton} \leq 87$$

$$M=1 \quad i=1$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = VOC content in pounds per gallon of each material employed

G<sub>i</sub> = Gallons used of each VOC containing material for the rolling 12-month period

n = total number of unique VOC containing materials employed in emission units P003, P007, & K001

Compliance with the annual restriction on the amount of VOC containing materials employed shall be based upon a rolling, 12-month summation.

Emissions units P003, P007 & K001 have been in operation for more than 12 months and, such the facility has existing usage and VOC emissions records for these operations in lieu of establishing monthly restrictions for the first year of operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall calculate and maintain monthly records of the VOC emissions and the rolling, 12-month emissions of VOC for emissions units P003, P007, & K001, combined.
- (2) The Ohio EPA's "Review of New Sources of Air Toxic Emissions" ("Air Toxic Policy"), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month VOC emission limitation of 87 tons, for emissions P003, P007, & K001, combined;
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:  
53.9 lbs VOC/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit\* for this emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this emissions limitation.

\*The potential to emit is based on a maximum hourly gallon usage rate of 15.4 gallons per hour and a maximum VOC content of 3.50 lbs/gallon.

b. Emission Limitation:  
21.88 lbs VOC/hr

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit\* for this emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this emissions limitation.

\*The potential to emit is based on a maximum hourly gallon usage rate of 6.25 gallons per hour and a maximum VOC content of 3.50 lbs/gallon.

c. Emission Limitation:  
87 tons of VOC per rolling, 12-month period for emissions P003, P007, & K001 combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements contained in section d)(1) of this permit.

g) Miscellaneous Requirements

(1) None.



**3. Emissions Unit Group -Pickling Line & Storage Tanks: P002,T001,T002,T003,T004,T005,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P002	Pickling Line
T001	HCl Storage Tank
T002	HCl Storage Tank
T003	Spent Pickle Liquor Storage Tank
T004	Spent Pickle Liquor Storage Tank
T005	Spent Pickle Liquor Storage Tank

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. d)(5).

(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. b)(1)b., b)(2)d., c)(1), d)(2), d)(3), d)(4), e)(1), and f)(1)b.

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)	0.85 lb particulate matter (PM)/hr& 3.72 tons PM/yr, from emissions units P002 & T001-T005, combined  See b)(2)a., b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05(D)	See b)(2)d. and c)(1)
c.	OAC rule 3745-17-11(B)	See b)(2)e.
d.	OAC rule 3745-17-07(B)	Visible PM from the stack serving the emissions unit(s) shall not exceed 20% opacity, as a six-minute average, except as provided by rule

(2) Additional Terms and Conditions

- a. The PM limitation refers to filterable particulate matter measured by Method 5 of 40 CFR Part 60, Appendix A.
- b. The requirements established pursuant to this rule include the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-17-07(B).
- c. The emissions from the emissions units listed above shall be vented to the wet scrubber when one or more of the emissions units are in operation.
- d. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V requirements. The federally enforceable emission limitation is based on the operational restriction(s) contained in c)(1) of this permit:
  - i. 1.64 lbsHCl/hr & 7.2 tons HCl/yr from emissions units P002 & T001-T005, combined

[The hourly HCl limitation was established based on the scrubber maximum outlet HCl concentration of 55 ppmv and a maximum air flow rate of 5482 ft<sup>3</sup>/min. The annual HCl emission limitation was established by multiplying the hourly limitation by 8760, and then dividing by 2000.]

- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of limiting potential to emit (PTE) to avoid Title V requirements [See b)(2)d.]:
  - a. the scrubber system shall be designed to meet 55 ppmvHCl.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall document each day the scrubber system was not in service when the emissions unit was in operation.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range for the pressure drop across the scrubber, that must be maintained in order to demonstrate compliance, shall be between 10 to 14 inches of water.
- (3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than 2 gallons per minute.
- (4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in inches of water) and the scrubber liquid flow rate (in gallons per minute) during operation of this/these emissions unit(s),

including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid flow rate on a daily basis. 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.

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 and flow rate readings immediately after the corrective action was 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 3745-15-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the pressure drop and liquid flow rate 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 or liquid flow rate based upon information obtained during future performance tests that demonstrate

compliance with the allowable particulate 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.

- (5) The permit to install for this emissions unit (P002 & T001-T005) 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" ("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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hydrochloric Acid

TLV (mg/m3): 7

Maximum Hourly Emissions Rate (lbs/hr): 1.64

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 23.55

MAGLC (ug/m3): 166.67

Physical changes to or changes 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 Toxic 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 applying 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 toxic air contaminant listed in OAC rule 3734-114-01 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 compositions of the materials, or use of new materials that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01 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 evaluation to determine that the changed emissions unit will still 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. where 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.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. all exceedances of the 1.64 lbsHCl/hr & 7.2 tons HCl/yr from emissions units P002 & T001-T005, combined;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
  - (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
    - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
    - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
    - c. each incident of deviation described in e)(3)a. or e)(3)b. (above) where a prompt investigation was not conducted;
    - d. each incident of deviation described in e)(3)a. or e)(3)b. where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
    - e. each incident of deviation described in e)(3)a. or e)(3)b. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
  - (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- 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:  
0.85 lb PM/hr & 3.72 tons PM/yr from emissions units P002 & T001-T005 combined\*

\* The PM limitation refers to filterable particulate matter measured by Method 5 of 40 CFR Part 60, Appendix A.

Applicable Compliance Method:

The hourly emission limitation was developed by summing the PM emissions from the pickling line (P002) and from the storage tanks (T001-T005). Emissions for each were calculated as follows:

PM emissions from filterable particulate matter from the pickling line was developed by multiplying a company provided emission factor of 0.001332 lb PM/ton steel processed\* by a maximum capacity of 260 tons steel/hr (0.35 lb PE/hr).

\*Company supplied emission factor of 0.00111 lb PM/ton steel processed was augmented by 20% to account for possible errors associated with test sampling and measurement. PM emissions from the storage tanks were based on an engineering estimate of 0.10 lb PE/tank (0.50 lb PE/hr). If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission rate by the maximum operating schedule of 8760 hrs/yr, and applying a conversion factor of 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

- b. Emission Limitation:  
55 ppmv HCl, 1.64 lbs HCl/hr & 7.2 tons HCl/yr from emissions units P002 & T001-T005 combined

Applicable Compliance Method:

The ppmv design concentration was developed in order to establish the hourly and annual federally enforceable HCl restrictions. The hourly emission limitation was developed by converting the permit required design maximum HCl concentration of 55 ppmv to 1.64 lbs HCl/hr\*.

If required, the permittee shall demonstrate compliance with the design concentration and hourly emission limitation by testing in accordance with Methods 1-4 and 26A of 40 CFR Part 60, Appendix A.

\*takes into account a maximum air flow rate of 5482 ft<sup>3</sup>/min

The annual emission limitation was developed by multiplying the hourly emission rate by the maximum operating schedule of 8760 hrs/yr, and applying a conversion factor of 2000 lbs/ton. Therefore, provided compliance is shown with



**Draft Permit-to-Install and Operate**

WORTHINGTON STEEL

**Permit Number:** P0118922

**Facility ID:** 0326000076

**Effective Date:** To be entered upon final issuance

the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

c. Emission Limitation:

Visible particulate emissions from the stack(s) serving these emissions units shall not exceed 20% opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible particulate emissions limitation in accordance with OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.