Facility ID: 1677130066 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

Facility ID: 1677130066 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

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

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Steel coils coated with anti-rust oil prior to shipment to customers. Organic compound (OC) emissions uncontrolled. This facility is a natural minor source of volatile organic compounds and organic hazardous air pollutants.	OAC rule 3745-31-05(A)(3)	3.31 pounds/hour & 14.5 tons/year of OCs No photochemically reactive materials (PRMs), as defined in OAC rule 3745-21-01(C)(5), shall be employed in this emissions unit.
	OAC rule 3745-21-07(G)	Exempt from the requirements of OAC rule 3745-21-07(G)(2) per OAC rule 3745-21-07 (G)(9).

2. **Additional Terms and Conditions**

   (a) The OC emission limits established pursuant to OAC rule 3745-31-05(A)(3) reflect the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure ongoing compliance with these emission limits.

   However, the permittee shall apply for and, if required, obtain a final permit to install prior to equipment replacement or any proposed modification of equipment or production procedures, or any other change that would increase the potential emissions of any air pollutant.
   As a way to reduce air emissions, all liquid organic materials shall be properly identified and held in tightly closed containers at all times when not in use or waiting for appropriate off-site disposal.

B. **Operational Restrictions**

1. None

C. **Monitoring and/or Record Keeping Requirements**

1. On any day the permittee employs any photochemically reactive material(s) in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), the following information shall be collected and recorded:

   a. the company identification of each liquid organic material, excluding non photochemically reactive cleanup materials, employed in the emissions unit during each such day;

   b. the total quantity of liquid organic material(s) emitted, in pounds, excluding non photochemically reactive cleanup materials, from the emissions unit during each such day;

   c. the actual number of hours of operation of the emissions unit during each such day; and

   d. the average hourly rate of liquid organic material(s) emitted, in pounds/hour, excluding non photochemically reactive cleanup materials, from the emissions unit during each such day, i.e., d = b/c.

2. The permit to install for this emissions unit was evaluated based on the actual process materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics 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: kerosene (CAS 8008-20-6)
TLV (ug/m3): 200,000
Maximum Hourly Emission Rate (lbs/hr): 8
Predicted 1-Hour Maximum Ground-Level Concentration at 517 m (ug/m3): 31
MAGLC (ug/m3): 4762

3. 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxics Policy" will still be still 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 Toxics Policy" include the following:

a. changes in the composition of the materials used (process materials and cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxics 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the emissions unit, if changed as outlined above, will still satisfy the "Air Toxics 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 Toxics 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 Toxics Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify the days during which photochemically reactive materials were employed in the emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted in pounds, hourly and daily, during each such day.

These reports are due by the dates described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitations: 3.31 pounds/hour & 14.5 tons/year of OCs

Applicable Compliance Method: The above emissions limitations were established based on the following company-specified process/emissions data:

H = CPE; and
Y = H(8760 hours/year)(1 ton/2000 pounds),

Where:

H = 3.31 pounds/hour of OCs [hourly potential emissions];
Y = 14.5 tons/year of OCs [yearly potential emissions];
C = 0.07 gallon of oil coating/ton of steel coil production [process factor];
P = 75 tons of steel coil production/hour [potential production rate];
E = 0.63 pound of OCs emitted /gallon of oil coating [emission factor].

F. **Miscellaneous Requirements**

1. None