



Environmental Protection Agency

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

10/20/2011

Certified Mail

Mr. Bud Smith  
Severstal Wheeling, Inc. - Martins Ferry  
1134 Market Street  
Wheeling, WV 26003

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0607090013  
Permit Number: P0108066  
Permit Type: Initial Installation  
County: Belmont

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI 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  
309 South Fourth Street, Room 222  
Columbus, OH 43215

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. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southeast District Office. 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 "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: U.S. EPA  
Ohio EPA-SEDO; Pennsylvania; West Virginia





**FINAL**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Severstal Wheeling, Inc.- Martins Ferry

Facility ID:	0607090013
Permit Number:	P0108066
Permit Type:	Initial Installation
Issued:	10/20/2011
Effective:	10/20/2011





Division of Air Pollution Control
Permit-to-Install
for
Severstal Wheeling, Inc.- Martins Ferry

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## Authorization

Facility ID: 0607090013  
Facility Description: Steel Strip galvanizing finishing plant  
Application Number(s): A0041786, A0042885  
Permit Number: P0108066  
Permit Description: Voluntary PTI to initiate changes to the cleaning section of the existing 60-inch galvanizing line so the line can also be used as a pickling/galvanizing line.  
Permit Type: Initial Installation  
Permit Fee: \$200.00  
Issue Date: 10/20/2011  
Effective Date: 10/20/2011

This document constitutes issuance to:

Severstal Wheeling, Inc.- Martins Ferry  
1001 Main Street  
Martins Ferry, OH 43935-1796

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

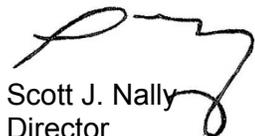
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0108066  
Permit Description: Voluntary PTI to initiate changes to the cleaning section of the existing 60-inch galvanizing line so the line can also be used as a pickling/galvanizing line.

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>P903</b>
Company Equipment ID:	Galvanizing Line No. 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### 4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
  - (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, and (ii) any deviations from operational restrictions.

and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. If no deviations occurred during a calendar quarter, the permitteeshall

submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### 10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

#### 11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All

records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## 13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## 14. Public Disclosure

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

## 15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

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

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under State law only:
  - a) None.

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



**P903, Galvanizing Line No. 3**

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

Continuous, 60-inch, pickling and/or galvanizing line, including acid cleaning section controlled by a wet scrubber, a gas-fired dryer, and a galvanizing kettle and hot dip zinc pot controlled by a baghouse.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under State law only.
  - (1) None.
- b) Applicable Emission 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 emission 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 Emission Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except for a period of 6 consecutive minutes in a 60-minute period. Visible particulate emissions shall not exceed 60% opacity, as a 6-minute average, at any time.
b.	OAC rule 3745-17-07(B)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.
c.	OAC rule 3745-17-08(B)	Reasonably available control measures shall be implemented to minimize or eliminate the visible emissions of fugitive dust. See b)(2)a. and b. below.
d.	OAC rule 3745-17-11(B)(1)	Total combined particulate emissions from emissions units P901, P902, and P903 shall not exceed 27.9 pounds per hour (based on curve P-1 of Figure II).
e.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 611.6 pounds per hour.
f.	OAC rule 3745-31-05(F)	See b)(2)c. below.
g.	40 CFR Part 63, Subpart A	The following general provisions are applicable to 40 CFR Part 63, Subpart CCC: 63.1-63.5; 63.6(a)-(g); 63.6(i)-(j); 63.7-63.9; 63.10(a)-(c); 63.10(d)(1)-(2); 63.10(d)(4)-(5); 63.10(e)-(f); and 63.12-63.15.

	Applicable Rules/Requirements	Applicable Emission Limitations/Control Measures
h.	40 CFR Part 63, Subpart CCC	Hydrogen chloride (HCl) emissions from the outlet of the wet scrubber serving this line shall not exceed 6 parts per million by volume (ppmv); or be emitted at a mass emission rate that corresponds to a collection efficiency of less than 99%. See b)(2)d. through f. below.

(2) Additional Terms and Conditions

- a. The permittee shall employ reasonable available control measures on the hot dip zinc pot equipment for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintaining enclosures of such equipment to ensure compliance. Also, the permittee shall maintain and employ the hoods and ducts over the galvanizing kettle to minimize the headroom and air gaps and ensure that the fumes are captured to the extent possible with good engineering design, in order to minimize or eliminate visible emissions of fugitive dust at the capture location(s). Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

[OAC rules 3745-17-08 and 3745-77-07(C)(1)]

- b. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

[OAC rules 3745-17-08 and 3745-77-07(C)(1)]

- c. The permittee has requested this voluntary permit-to-install to initiate changes to the cleaning section of the existing galvanizing line so that the facility may employ an alternate operating scenario and also use the emissions unit as a pickling/galvanizing line. The voluntary permit-to-install is necessary to (1) promptly accommodate the needed changes to the existing line prior to completing the renewal of the facility's extended Title V permit; (2) incorporate the new applicable requirements (40 CFR Part 63, Subpart CCC) that will be effective upon start-up of the pickling/galvanizing operation; and (3) legally facilitate the requested changes to the existing galvanizing line because the changes to the line do not meet the definition of a modification under OAC Chapter 3745-31.

[OAC rule 3745-31-05(F)]

- d. The permittee shall achieve initial compliance with the requirements of 40 CFR Part 63, Subpart CCC, upon start-up of the acid cleaning section of this line.

[40 CFR Part 63.1160(a)(2)]

- e. As required by section 63.6(e)(3) of 40 CFR Part 63, Subpart A, the permittee shall develop and implement a written startup, shutdown, and malfunction plan for the acid cleaning section of this line that describes, in detail, procedures for operating and maintaining the emissions unit during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the 40 CFR Part 63, Subpart CCC.

[40 CFR Part 63.1160(b)(1)]

- f. The permittee shall implement an operation and maintenance plan for each emission control device, upon start-up of the acid cleaning section of this line, in accordance with 40 CFR Part 63, Subpart CCC. The plan will be incorporated by reference into the facility's Title V permit. The plan must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:
- i. require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
  - ii. require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
  - iii. require cleaning of the scrubber internals at intervals sufficient to prevent buildup of solids or other fouling; and
  - iv. require an inspection of the scrubber at intervals of no less than 3 months with:
    - (a) cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
    - (b) repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
    - (c) repair or replacement of droplet eliminator elements as needed;
    - (d) repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
    - (e) adjustment of damper settings for consistency with the required air flow.
  - v. If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Ohio EPA, Southeast District Office may be used.
  - vi. The permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem with the acid cleaning

section of this line and/or the wet scrubber and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of 40 CFR Part 63, Subpart CCC.

- vii. The permittee shall maintain a record of each inspection of the acid cleaning section of this line and the wet scrubber, including each item identified in Section A.III.3.iv, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

[40 CFR Part 63.1160(b)(2)]

c) Operational Restrictions

- (1) The production rate for this emissions unit shall not exceed 90 tons per hour, or 160 tons per hour, combined, from emissions units P901, P902, and P903.

[OAC rules 3745-17-11(B)(1) and 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable particulate emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across each baghouse module is between 1.0 to 10.0 inches of water when the emissions unit is in operation.

The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop, in inches of water, across each baghouse module when the emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across each baghouse module on once per shift 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 the pressure drop deviates from the limit or range 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 operation of the control equipment within the acceptable range 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:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. 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.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Southeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled 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 a minor permit modification.

The permittee shall maintain an inventory of replacement bags equal to or greater than 10% of the total number of bags in all baghouse modules. The permittee shall restock filter bags to the 10% spare quantity standard within 30 days of falling below the standard.

[OAC rules 3745-31-05(F) and 3745-77-07(C)(1)]

- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in inches of water), the scrubber makeup water flow rate (in gallons per minute), and the scrubber recirculation water flow rate (in gallons per minute if the scrubber uses a water recirculation device) when the emissions unit is in operation. 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. The monitoring device used to monitor the scrubber makeup water flow rate shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in

accordance with the manufacturer's instructions, but not less frequently than once per year.

The permittee shall collect and record the following information each shift when the emissions unit is operating:

- a. the pressure drop across the scrubber, in inches of water;
- b. the scrubber makeup water flow rate, in gallons per minute;
- c. the scrubber recirculation water flow rate, in gallons per minute if the scrubber uses a water recirculation device; and
- d. the down times for the control device and/or monitoring equipment when the emissions unit was in operation.

[40 CFR Parts 63.1160(b)(2) and 63.1162(a)(2) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall record the average hourly production rate during each operating shift.

[OAC rules 3745-17-11(B)(1) and 3745-77-07(C)(1)]

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack and for any visible emissions of fugitive dust escaping from the enclosures on the hot dip zinc pot equipment associated with 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 location and 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.

- (5) 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 daily 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.

- (6) [OAC rules 3745-17-07(A) 3745-17-07(B), 3745-17-08(B), and 3745-77-07(C)(1)]
- (7) The permittee shall maintain records for the acid cleaning section of this line and the associated wet scrubber for 5 years from the date of each record of:
- a. the occurrence and duration of each startup, shutdown, or malfunction of the emissions unit;
  - b. the occurrence and duration of each malfunction of the air pollution control equipment;
  - c. all maintenance performed on the air pollution control equipment;
  - d. actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
  - e. all information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan;
  - f. all required measurements needed to demonstrate compliance with 40 CFR Part 63, Subpart CCC, and to support the data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;
  - g. all results of initial or subsequent performance tests;
  - h. all documentation supporting initial notifications and notifications of compliance status; and
  - i. records of any applicability determination, including supporting analyses.
- [40 CFR Part 63.1165(a)]
- (8) The permittee shall also maintain records of the following information for 5 years from the date of each record:
- a. the scrubber makeup water flow rates and recirculation water flow rates;
  - b. the calibration and manufacturer certification that the monitoring devices are accurate to within 5%; and
  - c. each maintenance inspection and repair, replacement, or other corrective action.

[40 CFR Part 63.1165(b)]

- (9) The permittee shall keep the written operation and maintenance plan on record to be made available for inspection, upon request, by the Ohio EPA for the life of the emissions unit or until the emissions unit is no longer subject to the provisions of 40 CFR Part 63, Subpart CCC. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Ohio EPA for a period of 5 years after each revision to the plan.

[40 CFR Part 63.1165(b)(3)]

- (10) All records required by sections d)(5) and d)(6) of these terms and conditions for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

[40 CFR Part 63.1165(c)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify any average hourly production rate, on a per shift basis, during which the average hourly production limitation was exceeded, and the actual average hourly production rate for each such shift.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- each period of time (start time and date, and end time and date) when the pressure drop across each baghouse module was outside of the acceptable range;
  - 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 baghouse;
  - each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
  - each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - each incident of deviation described in "a" 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.

[OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall submit quarterly reports that include the following information:
- the number of replacement bags, in inventory, for the baghouse modules whenever the number falls below the required 10% inventory; and

- b. the number of days between falling below the 10% spare quantity standard and the actual restocking of the filter bags to maintain the 10% spare quantity standard.

[OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) identify 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, fugitive dust escaping from the enclosures on the zinc pot and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive dust emissions. These reports shall be submitted to the Director (the Ohio EPA, Southeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rules 3745-17-07(A) and (B), and 3745-77-07(C)(1)]

- (5) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the scrubber, the scrubber makeup water flow rate, and/or the scrubber recirculation water flow rate were not maintained at or above the operating parameter values established during the most recent emission tests that demonstrated that the emissions unit was in compliance.

[OAC rule 3745-77-07(C)(1)]

- (6) As required by section 63.10(d)(5)(i) of 40 CFR Part 63, Subpart A, the permittee shall submit the following reports:
  - a. If actions taken by the permittee during a startup, shutdown, or malfunction of the emissions unit (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 31th day following the end of each calendar half.
  - b. Any time an action taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of section 63.10(d)(5)(ii) of 40 CFR Part 63, Subpart A.

[63.1164(c)(2) and (3)]

- (7) As required by §63.9(b)(3) of subpart A of this part, the owner or operator of a new or reconstructed affected source, or a source that has been reconstructed such that it is an affected source, that has an initial startup after the effective date and for which an application for approval of construction or reconstruction is not required under §63.5(d) of subpart A of this part, shall notify the Administrator in writing that the source is subject

to the standards no later than 120 days after initial startup. The notification shall contain the information specified in §§63.9(b)(2)(i) through 63.9(b)(2)(v) of subpart A of this part, delivered or postmarked with the notification required in §63.9(b)(5) of subpart A of this part.

[40 CFR Part 63.1163]

- (8) As required by §63.9(e) of subpart A of this part, the owner or operator of an affected source shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow the Administrator to review and approve the site-specific test plan required under §63.7(c) of subpart A of this part and, if requested by the Administrator, to have an observer present during the test.

[40 CFR Part 63.1163]

- (9) The owner or operator of an affected source shall submit a notification of compliance status as required by §63.9(h) of subpart A of this part when the source becomes subject to this standard.

[40 CFR Part 63.1163]

f) **Testing Requirements**

- (1) Compliance with the emission 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 any stack shall not exceed 20% opacity as a 6-minute average, except for a period of 6 consecutive minutes in a 60-minute period. Visible particulate emissions shall not exceed 60% opacity, as a 6-minute average, at any time.

**Applicable Compliance Method:**

If required, compliance with this emission limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[OAC rules 3745-17-03(B), 3745-17-07(A) and 3745-77-07(C)(1)]

b. **Emission Limitation:**

Visible particulate emissions of fugitive dust shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

[OAC rules 3745-17-03(B), 3745-17-07(B) and 3745-77-07(C)(1)]

c. Emission Limitation:

Total combined particulate emissions from emissions units P901, P902, and P903 shall not exceed 27.9 pounds per hour.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated 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). The test(s) shall be conducted while emissions units P901, P902, and P903 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

[OAC rules 3745-17-03(B), 3745-17-11(B) and 3745-77-07(C)(1)]

d. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 611.6 pounds per hour.

Applicable Compliance Method:

SO<sub>2</sub> emissions from this emissions unit can only be emitted through the combustion of natural gas in the dryer. Compliance with this emission limitation may be demonstrated through the following equation that shows the maximum emissions from the dryers on all 3 galvanizing lines, combined:

$$(0.6 \text{ pound of SO}_2/\text{mmBtu})(0.059 \text{ mmBtu/hr}) = 0.0354 \text{ lb/hr of SO}_2$$

The SO<sub>2</sub> emission factor was obtained from AP-42, 5th Edition, Volume I, Chapter 1, Table 1.4-2, dated July, 1998.

If required, compliance with this emission limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 and the procedures specified in OAC rule 3745-18-04(A).

[OAC rules 3745-18-04(A), 3745-18-06(E) and 3745-77-07(C)(1)]

e. Emission Limitation:

HCl emissions from the outlet of the wet scrubber serving this line shall not exceed 6 parts per million by volume (ppmv); or be emitted at a mass emission rate that corresponds to a collection efficiency of less than 99%.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A and the requirements specified in b) (2) below.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

The emission testing shall be conducted within 180 days of the start-up of the acid cleaning section this emissions unit.

If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously.

The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (30 dry standard cubic feet).

The concentration of HCl shall be calculated for each run as follows:

$$C_{\text{HCl}}(\text{ppmv}) = 0.659 C_{\text{HCl}}(\text{mg/dscm}), \text{ and}$$

where C(ppmv) is concentration in ppmv and C(mg/dscm) is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emissions test(s).

Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written

report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

[40 CFR Parts 63.7, 63.1161(d) and 63.1164(a)]

- (2) The owner or operator shall conduct an initial performance test for each process or emission control device to determine and demonstrate compliance with the applicable emission limitation according to the requirements in §63.7 of subpart A of this part and in this section.

Following approval of the site-specific test plan, the owner or operator shall conduct a performance test for each process or control device to either measure simultaneously the mass flows of HCl at the inlet and the outlet of the control device (to determine compliance with the applicable collection efficiency standard) or measure the concentration of HCl (and Cl<sub>2</sub> for hydrochloric acid regeneration plants) in gases exiting the process or the emission control device (to determine compliance with the applicable emission concentration standard).

Compliance with the applicable concentration standard or collection efficiency standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.

Compliance is achieved if either the average collection efficiency as determined by the HCl mass flows at the control device inlet and outlet is greater than or equal to the applicable collection efficiency standard, or the average measured concentration of HCl or Cl<sub>2</sub> exiting the process or the emission control device is less than or equal to the applicable emission concentration standard.

During the performance test for each emission control device, the owner or operator using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation, the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The owner or operator shall determine the operating parameter monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per paragraph (a)(2) of this section. An owner or operator may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, an owner or operator may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

[40 CFR Parts 63.1161(a) and 63.1161(b)]

g) Miscellaneous Requirements

- (1) None.