

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 02-22753

A. Source Description

Wheatland Tube Co. is an existing facility located at 901 Dietz Road, Warren, Ohio. The plant produces steel pipe.

B. Facility Emissions and Attainment Status

Wheatland Tube currently operates under a Synthetic Minor Permit to Operate. The facility is located in Trumbull County which is currently attainment for all criteria pollutants. Wheatland currently limits potential VOC emissions from one emissions unit that applies a clear coat varnish to steel pipe.

C. Source Emissions

Wheatland Tube is proposing to install a second pipe coating operation that will coat pipe in-line, as opposed to the existing line, K001, that coats pipe off line. The new mill will use a water-based coating that is air cured, then cut the pipe to length.

K001 is currently limited to 93 TPY of VOC. It also has limitations for HAPs emissions. The new paint line will have a potential emission of 43.8 TPY of VOC. Thus, Wheatland Tube is proposing to limit emissions from the new line and take lower limitations on the existing line to remain below 100 TPY VOC .

Wheatland Tube will lower the VOC content of coating used on K001, take low VOC content limitations on the new line, and monitor usage on both lines such that the combined emissions of the two lines remain below 95 tons per year VOC, based upon a rolling, 12-month summation of the monthly emissions. The existing HAPs limitation on K001 will be used to limit HAPS from both lines.

D. Conclusion

The federally enforceable synthetic minor PTI will limit the facility-wide VOC emissions to 95 TPY . Wheatland Tube currently records VOC usage rates and with this permit will continue to be required to monitor, record keep and record material usage rates, along with a rolling, 12-month summation of the monthly emissions. Wheatland will also monitor, record keep and record information on HAPs usage and emissions for both lines. This permit will assure that Wheatland will stay a minor source with respect to the threshold for requiring a TV permit, and for applicability of the MACT regulations, 40 CFR Part 63.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
TRUMBULL COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 02-22753

Fac ID: 0278080757

DATE: 9/25/2007

Wheatland Tube Co.
Arthur E. Hall
P.O. Box 608
Wheatland, PA 16161

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$300** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: USEPA

NEDO

EASTGATE DEV & TRANS STUDY

WV

PA

TRUMBULL COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-22753** FOR AN AIR CONTAMINANT SOURCE
FOR **Wheatland Tube Co.**

On 9/25/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Wheatland Tube Co.**, located at **901 Dietz Rd NE, Warren, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22753:

coating operation.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 02-22753

Application Number: 02-22753
Facility ID: 0278080757
Permit Fee: **To be entered upon final issuance**
Name of Facility: Wheatland Tube Co.
Person to Contact: Arthur E. Hall
Address: P.O. Box 608
Wheatland, PA 16161

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

**901 Dietz Rd NE
Warren, Ohio**

Description of proposed emissions unit(s):

coating operation.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Wheatland Tube Co.

Facility ID: 0278080757

PTI Application: 02-22753

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Wheatland Tube Co.

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Volatile Organic Compounds (VOC)	95.0

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

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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (K001) - clear coat varnish line V100

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.a and A.2.b below.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
OAC rule 3745-21-09(U)(1)(a)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).
OAC rule 3745-35-07(B)	See sections A.2.c and A.2.d below.

2. Additional Terms and Conditions

- 2.a The VOC emissions from the coatings employed in this emissions unit shall not exceed 1110 pounds of VOC per day.
- 2.b The VOC content of coatings shall not exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.
- 2.c The permittee shall limit emissions from emissions units K001 and K002, combined, to 95.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- 2.d Hazardous air pollutant (HAP) emissions from emissions units K001 and K002, combined, shall not exceed:
 - i. 9.9 tons/year* of any individual HAP; and

Emissions Unit ID: **K001**

ii. 24.9 tons/year* of total combined HAPs.

* based upon a rolling, 12-month summation of the monthly emissions.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. the total VOC emissions from all the coating materials employed, in pounds.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification of each cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the total VOC emissions from all coatings and cleanup materials employed, in tons; and
 - e. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed (i.e., sum the monthly VOC emissions for the current month plus the previous 11-month period).
4. The permittee shall collect and record the following information each month:
 - a. the name and identification number of each coating, as applied;

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- b. the individual HAP content for each HAP of each coating, as applied, as a weight fraction;
- c. the total combined HAP content for each coating, as applied, as a weight fraction (i.e., sum all the individual HAP contents from b);
- d. the number of gallons of each coating employed;
- e. the density of each coating employed;
- f. the name and identification of each cleanup material employed;
- g. the individual HAP content for each HAP of each cleanup material, as applied, as a weight fraction;
- h. the total combined HAPs content of each cleanup material, as applied, as a weight fraction (i.e., sum all the individual HAP contents from g);
- i. the number of gallons of each cleanup material employed;
- j. the density of each cleanup material, as employed;
- k. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons (i.e., for each HAP, the sum of (b) times (d) times (e) for each coating plus the sum of (g) times (i) times (j) for each cleanup material);
- l. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons (i.e., the sum of (c) times (d) times (e) for each coating plus the sum of (h) times (i) times (j) for each cleanup material); and
- m. the rolling, 12-month individual HAP emissions (for each HAP) and the rolling, 12-month total combined HAPs emissions from all coatings and cleanup materials employed, in tons.

A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Northeast District Office. Material Safety Data Sheets or VOC data sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

- 5. If the permittee uses only coatings and cleanup materials that contain no HAPs in a

Emissions Unit ID: **K001**

given month, the permittee shall note this fact with the VOC required records of Section C.3.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the use of noncomplying coatings (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports that identify any day when the VOC emission rate exceeded 1110 pounds per day. Each report shall specify each such day's emission rate and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days after the exceedance occurs.
4. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing the rolling, 12-month summation of the monthly VOC emissions from emissions units K001 and K002, combined, exceeded 95.0 tons per year.
5. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of:
 - a. the individual HAP emission limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period; and
 - b. the total combined HAP emission limitation from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.
6. The quarterly deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and

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conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC content of coatings shall not exceed 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.

The VOC contents of the coating materials shall be based upon U.S. EPA Method 24 or formulation data.

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b. Emission Limitation:

The VOC emissions from the coatings employed in this emissions unit shall not exceed 1110 pounds of VOC per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.

c. Emission Limitation:

PE shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

To determine the actual worst case emission rate for particulates, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

where:

E = particulate emission rate (lb/hr);

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = control efficiency of the control equipment.

If required pursuant to OAC rule 3745-15-04, the permittee shall demonstrate compliance through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Wheatland Tube Co.

DTI Application: 02 22752

Facility ID: 0278080757

Emissions Unit ID: K001

Compliance shall be demonstrated based upon visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

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e. Emission Limitation:

The permittee shall limit emissions from emissions units K001 and K002, combined, to 95.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the record keeping requirements specified in section C.3.e for emissions unit K001 and section C.2.e for emissions unit K002, combined.

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

f. Emission Limitations:

HAP emissions from emissions units K001 and K002, combined, shall not exceed 9.9 tons/year of any individual HAP and 24.9 tons/year of total combined HAPs based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the record keeping requirements specified in section C.4.m for emissions unit K001 and section C.3.m for emissions unit K002, combined.

Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

1. The following terms and conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC rule 3745-35-07: A through F.

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

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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (K002) - coater/dryer No.2 Mill

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.a and A.2.b below.
OAC rule 3745-35-07(B)	See sections A.2.c and A.2.d below.
OAC rule 3745-21-09(U)(1)(a)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A).

2. Additional Terms and Conditions

- 2.a The VOC emissions from the coatings employed in this emissions unit shall not exceed 240 pounds of VOC per day.
- 2.b The VOC content of coatings shall not exceed 2.15 pounds VOC per gallon of coating, excluding water and exempt solvents.
- 2.c The permittee shall limit emissions from emissions units K001 and K002, combined, to 95.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- 2.d Hazardous air pollutant (HAP) emissions from emissions units K001 and K002, combined, shall not exceed:
 - i. 9.9 tons/year* of any individual HAP; and
 - ii. 24.9 tons/year* of total combined HAPs.

* based upon a rolling, 12-month summation of the monthly emissions.

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B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. the total VOC emissions from all the coating materials employed, in pounds.
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification of each cleanup material employed;
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each VOC cleanup material employed ;
 - d. the total VOC emissions from all coatings and cleanup materials employed, in tons; and
 - e. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed (i.e., sum the monthly VOC emissions for the current month plus the previous 11-month period).
3. The permittee shall collect and record the following information each month:
 - a. the name and identification number of each coating, as applied;
 - b. the individual HAP content for each HAP of each coating, as applied, as a weight fraction;
 - c. the total combined HAP content for each coating, as applied, as a weight fraction (i.e., sum all the individual HAP contents from b);

Emissions Unit ID: **K002**

- d. the number of gallons of each coating employed;
- e. the density of each coating employed;
- f. the name and identification of each cleanup material employed;
- g. the individual HAP content for each HAP of each cleanup material, as applied, as a weight fraction;
- h. the total combined HAPs content of each cleanup material, as applied, as a weight fraction (i.e., sum all the individual HAP contents from g);
- i. the number of gallons of each cleanup material employed;
- j. the density of each cleanup material, as employed;
- k. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons (i.e., for each HAP, the sum of (b) times (d) times (e) for each coating plus the sum of (g) times (i) times (j) for each cleanup material);
- l. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons (i.e., the sum of (c) times (d) times (e) for each coating plus the sum of (h) times (i) times (j) for each cleanup material); and
- m. the rolling, 12-month individual HAP emissions (for each HAP) and the rolling, 12-month total combined HAPs emissions from all coatings and cleanup materials employed, in tons.

A listing of HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Northeast District Office. Material Safety Data Sheets or VOC data sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

- 4. If the permittee uses only coatings and cleanup materials that contain no HAPs in a given month, the permittee shall note this fact with the VOC required records of section C.3.
- 5. The permit to install for this emissions unit (K002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this

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emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2 butoxyethanol

TLV (mg/m³): 96.7

Maximum Hourly Emission Rate (lbs/hr): 0.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,031.5

MAGLC (ug/m³): 2302

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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under

Emissions Unit ID: **K002**

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) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 the 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.

D. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northeast District Office) in writing of any monthly record showing the use of noncomplying coatings (for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.
2. The permittee shall submit deviation (excursion) reports that identify any day when the VOC emission rate exceeded 240 pounds per day. Each report shall specify each such day's emission rate and shall be sent to the Director (the Ohio EPA Northeast District Office) within 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing the rolling, 12-month summation of the monthly VOC emissions from emissions units K001 and K002, combined, exceeded 95.0 tons per year.
4. The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of:

Issued: To be entered upon final issuance

- a. the individual HAP emission limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period; and
 - b. the total combined HAP emission limitation from all coatings and cleanup materials employed, in pounds or tons per rolling, 12-month period.
5. The quarterly deviation (excursion) reports shall be submitted in accordance with section 3.b of the General Terms and Conditions.

E. Testing Requirements

1. Compliance with the emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The VOC content of coatings shall not exceed 2.15 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.

The VOC contents of the coating materials shall be based upon U.S. EPA Method 24 or formulation data.

b. Emission Limitation:

The VOC emissions from the coatings employed in this emissions unit shall not exceed 240 pounds of VOC per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.1.

c. Emission Limitation:

The permittee shall limit emissions from emissions units K001 and K002, combined, to 95.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Wheatland Tube Co.

DTL Application: 02 22752

Facility ID: 0278080757**Emissions Unit ID: K002****Applicable Compliance Method:**

Compliance shall be demonstrated based upon the summation of the record keeping requirements specified in section C.3.e for emissions unit K001 and section C.2.e for emissions unit K002, combined.

Formulation data or U.S. EPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

d. Emission Limitations:

HAP emissions from emissions units K001 and K002, combined, shall not exceed 9.9 tons/year of any individual HAP and 24.9 tons/year of total combined HAPs based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the record keeping requirements specified in section C.4.m for emissions unit K001 and section C.3.m for emissions unit K002, combined.

Formulation data shall be used to determine the HAP contents of the coatings and cleanup materials.

Issued: To be entered upon final issuance

F. Miscellaneous Requirements

1. The following terms and conditions have been incorporated into this permit in order to establish federally enforceable limitations on potential to emit, pursuant to OAC rule 3745-35-07: A through F.

Wheatland Tube Co.
 PTI Application: 02-22753
 Issued: To be entered upon final issuance

Facility ID: 0278080757

Emissions Unit ID: K002

SIC CODE 3317 SCC CODE 40200101 EMISSIONS UNIT ID K001
 EMISSIONS UNIT DESCRIPTION clear coat varnish line V100
 DATE INSTALLED 8/85

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	1110 lbs/day	25	1110 lbs/day	95
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Enter Determination 3.5 lbs/voc /gal, more restrictive than OAC 3745-21-09(U)

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____

Wheatland Tube Co.
 PTI Application: 02-22753
 Issued: To be entered upon final issuance

Facility ID: 0278080757

Emissions Unit ID: K002

SIC CODE 3317 SCC CODE 40200201 EMISSIONS UNIT ID K002
 EMISSIONS UNIT DESCRIPTION coater/dryer No.2 Mill
 DATE INSTALLED 10/2007

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	240 lbs/day	43.8	240 lbs/day	95
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination use of waterbase coatings

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: 2 butoxyethanol