



Environmental Protection Agency

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

4/16/2012

Mr. Keith Hamburg  
TRINITY HIGHWAY PRODUCTS LLC  
425 East O'Conner Avenue  
Lima, OH 45801

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

Facility ID: 0302020107  
Permit Number: P0109754  
Permit Type: Initial Installation  
County: Allen

Dear Permit Holder:

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

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

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

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

Sincerely,

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

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

Certified Mail

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





Permit Strategy Write-Up

1. Check all that apply:

X Synthetic Minor Determination

Netting Determination

Source Description: Trinity Industries, is a Guard Rail fabrication facility located in Lima, Ohio. The company has historically had two galvanizing tanks which are a source of HCL emissions.

2. Facility Emissions and Attainment Status:

Trinity Industries, is located in Allen County and is classified as a "minor source" for Title V permitting requirements under Engineering Guide #61 but has potential emissions above Title V major source thresholds. In addition, the facility is not considered a "major source" for MACT permitting requirements as the existing operations are not subject to any MACT category. Allen County is designated attainment for all criteria pollutants.

3. Source Emissions:

Trinity Industries, as part of the proposal address the permitting requirements at the facility, has included a synthetic minor request as part of the permit application to maintain HCL emissions at existing levels.

4. Conclusion:

As part of the company's strategy to maintain its status as "non- major" for Title V permitting applicability, this PTI will incorporate federally enforceable permit conditions to include these emissions units into the facilities current restrictions. Therefore, there will be no change in the status of this facility.

5. Please provide additional notes or comments as necessary:

None

6. Total Permit Allowable Emissions Summary (for informational purposes only):

Table with 2 columns: Pollutant, Tons Per Year. Row 1: HCL, 9.3



PUBLIC NOTICE  
4/16/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

TRINITY HIGHWAY PRODUCTS LLC  
425 E. O' CONNOR AVE,  
Lima, OH 45801  
Allen County  
FACILITY DESC.: Highway, Street, and Bridge Construction  
PERMIT #: P0109754  
PERMIT TYPE: Initial Installation  
PERMIT DESC: Installation of two Batch Pickling Operations

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



**Ohio**

**Environmental  
Protection Agency**

**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
TRINITY HIGHWAY PRODUCTS LLC**

Facility ID:	0302020107
Permit Number:	P0109754
Permit Type:	Initial Installation
Issued:	4/16/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
TRINITY HIGHWAY PRODUCTS LLC

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? ..... 4
3. What records must I keep under this permit? ..... 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
7. What reports must I submit under this permit? ..... 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? ..... 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7
15. What happens if a portion of this permit is determined to be invalid? ..... 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions ..... 10
1. P004, Batch Fed Zinc Galvanizing Operations (Nut & Bolt)..... 11
2. P005, Batch Fed Zinc Galvanizing Operations (Guard Rail)..... 17





## Authorization

Facility ID: 0302020107  
Application Number(s): A0044138  
Permit Number: P0109754  
Permit Description: Installation of two Batch Pickling Operations  
Permit Type: Initial Installation  
Permit Fee: \$625.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 4/16/2012  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

TRINITY HIGHWAY PRODUCTS LLC  
425 E. O' CONNOR AVE  
Lima, OH 45801

of a Permit-to-Install and Operate 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, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0109754

Permit Description: Installation of two Batch Pickling Operations

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>P004</b>
Company Equipment ID:	P004
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	P005
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



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



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

---

<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

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



1. P004, Batch Fed Zinc Galvanizing Operations (Nut & Bolt)

Operations, Property and/or Equipment Description:

1.0 TPH Pickling and Galvanizing Operations

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(4).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

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

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists three rows (a, b, c) detailing specific rules and their corresponding emission limits for particulate matter and hydrochloric acid.



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row d: OAC rule 3745-17-11(B)(5)(a), See b)(2)c.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) requirements established under OAC rule 3745-31-05(A)(3), as effective November 30, 2001, have been determined to be the following:
i. compliance with the emission limitations established in b)(1)a; and
ii. compliance with the visible emission limitation established under OAC rule 3745-17-07(A).
b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V permitting requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1):
i. 9.4 tons HCl per rolling, 12-month period for emissions units P004 and P005 combined; and,
ii. 16.3 tons PE per rolling, 12-month period for emissions units P004 and P005, combined.
c. The emissions limitation specified by this rule is less stringent than the emission limitation pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)b.]:
a. The maximum annual production rate for emission units P004 and P005 combined shall not exceed 75,000 tons of steel per year, based upon a rolling, 12-month summation of the amount of steel processed, and,
b. The maximum HCl concentration of the solution shall not be greater than 12% by weight.

Emission units P004 and P005 are existing emissions units, and, as such, monthly production records exist. The permittee shall use the existing records to determine compliance upon issuance of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

## d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emission units P004 and P005 combined:
  - a. the amount of steel processed, in tons;
  - b. the calculated monthly emission rate for HCl and PE, in tons; and
  - c. the rolling, 12-month summation of the emission rate for HCl and PE, in tons.
- (2) For each day during which the permittee uses aHCl solution greater than 12%, the permittee shall maintain a record of the concentration and quantity of solution used in this emissions unit.
- (3) 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 stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the 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.

- (4) Permit to Install P0109754 for emissions units P004 and P005 was evaluated based on the actual materials and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the AERMAP Version 11103 model was compared to the Maximum Acceptable Ground-Level

Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

**Pollutant:** HCl

TLV (mg/m<sup>3</sup>): 2.983

Maximum Hourly Emission Rate (lbs/hr): 4.69

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 58.21

MAGLC (ug/m<sup>3</sup>): 71.02

Physical changes to or changes in the method of operation of the emissions units after 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 an toxic air contaminant listed in OAC rule 3745-114-01 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01 that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change

The permittee shall collect, record, and retain the following information when it conducts 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 its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All deviations (excursions) of the following emission limitations and operational restrictions that restrict the potential to emit (PTE) and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. production restriction of 75,000 tons of steel per year,
    - ii. 9.4 tons HCl per rolling, 12-month period, and
    - iii. 16.3 tons PE per rolling, 12-month period.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual permit evaluation report the following occurrences concerning inspection and control requirements:
  - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.



The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the “Additional Information and Corrections” section of the PER that no visible emissions were observed and no corrective actions were taken.

f) Testing Requirements

(1) Compliance with the emission limitations in the terms and conditions specified in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

9.4 tons HCl per rolling, 12-month period.

16.3 tons PE per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitations shall be demonstrated by the recordkeeping requirements in section d)(1).

b. Emission Limitation:

1.40 lbs PE/hr

Applicable Compliance Method:

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

\*Potential to emit for this emissions unit was established by emission testing data previously conducted at the facility.

If required, the permittee shall demonstrate compliance by testing in accordance with Method 1-4 and 5 of 40 CFR Part 60, Appendix A.

c. Emission Limitation: Visible PE shall not exceed 20% opacity as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the methods and procedure specified in 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.



2. P005, Batch Fed Zinc Galvanizing Operations (Guard Rail)

Operations, Property and/or Equipment Description:

17.5 TPH Pickling and Galvanizing Operations

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(4).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

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

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 3 columns: Row ID, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. It lists three rows (a, b, c) detailing specific rules and their corresponding emission limits for particulates, hydrochloric acid, and opacity.



Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row d: OAC rule 3745-17-11(B)(5)(a), See b)(2)c.

(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) requirements established under OAC rule 3745-31-05(A)(3), as effective November 30, 2001, have been determined to be the following:
i. compliance with the emission limitations established in b)(1)a; and
ii. compliance with the visible emission limitation established under OAC rule 3745-17-07(A).
b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V permitting requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1):
i. 9.4 tons HCl per rolling, 12-month period for emissions units P004 and P005 combined; and,
ii. 16.3 tons PE per rolling, 12-month period for emissions units P004 and P005 combined.
c. The emissions limitation specified by this rule is less stringent than the emission limitation pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [see b)(2)b.]:
a. The maximum annual production rate for emission units P004 and P005, combined, shall not exceed 75,000 tons of steel per year, based upon a rolling, 12-month summation of the amount of steel processed, and,
b. The maximum HCl concentration of the solution shall not be greater than 12% by weight.

Emission units P004 and P005 are existing emissions units, and, as such, monthly production records exist. The permittee shall use the existing records to determine compliance upon issuance of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

## d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emission units P004 and P005, combined:
  - a. the amount of steel processed, in tons;
  - b. the calculated monthly emission rate for HCl and PE, in tons; and
  - c. the rolling, 12-month summation of the emission rate for HCl and PE, in tons.
- (2) For each day during which the permittee uses aHCl solution greater than 12%, the permittee shall maintain a record of the concentration and quantity of solution used in this emissions unit.
- (3) 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 stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the 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.

- (4) Permit to Install P0109754 for emissions units P004 and P005 was evaluated based on the actual materials and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the AERMAP Version 11103 model was compared to the Maximum Acceptable Ground-Level

Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

**Pollutant:** HCl

TLV (mg/m<sup>3</sup>): 2.983

Maximum Hourly Emission Rate (lbs/hr): 4.69

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 58.21

MAGLC (ug/m<sup>3</sup>): 71.02

Physical changes to or changes in the method of operation of the emissions units after 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 an toxic air contaminant listed in OAC rule 3745-114-01 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01 that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change

The permittee shall collect, record, and retain the following information when it conducts 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 its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

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

a. All deviations (excursions) of the following emission limitations and operational restrictions that restrict the potential to emit (PTE) and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. production restriction of 75,000 tons of steel per year,

ii. 9.4 tons HCl per rolling, 12-month period, and

iii. 16.3 tons PE per rolling, 12-month period.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(3) The permittee shall identify in the annual permit evaluation report the following occurrences concerning inspection and control requirements:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.



The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the “Additional Information and Corrections” section of the PER that no visible emissions were observed and no corrective actions were taken.

f) Testing Requirements

(1) Compliance with the emission limitations in the terms and conditions specified in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitations:

9.4 tons HCl per rolling, 12-month period.

16.3 tons PE per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month limitations shall be demonstrated by the recordkeeping requirements in section d)(1).

b. Emission Limitation:

6.65 lbs PE/hr

Applicable Compliance Method:

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

\*Potential to emit for this emissions unit was established by emission testing data previously conducted at the facility.

If required, the permittee shall demonstrate compliance by testing in accordance with Method 1-4 and 5 of 40 CFR Part 60, Appendix A.

c. Emission Limitation: Visible PE shall not exceed 20% opacity as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the methods and procedure specified in 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.