



Environmental  
Protection Agency

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

4/24/2012

David Kleimeyer  
Worthington Steel Company  
350 LAWTON AVENUE  
MONROE, OH 45050

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

Facility ID: 1409070344  
Permit Number: P0109660  
Permit Type: Renewal  
County: Butler

Certified Mail

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

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, Journal 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 Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219

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 Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
SWOQA; Indiana; Kentucky





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Worthington Steel is a steel service center where steel coils are slit to make narrower coils or sheared to make sheets of steel. Some of the coil steel is run through a pickle line to clean the coils and protect the surfaces. This air contaminant source, emissions unit P901, is the pickle line equipped with a scrubber and a scale breaker baghouse.

3. Facility Emissions and Attainment Status:

Facility emissions have been less than ten tons per year since 2005. Only volatile organic compound (VOC), organic compound (OC) and particulate emissions are more than a ton per year. The facility is in Butler County which is in attainment for all criteria pollutants.

4. Source Emissions:

The pickle line has particulate and hydrochloric acid (HCL) emissions from the scrubber stack and particulate emissions (PE) from the scale breaker baghouse. VOC emissions come from protective oils used on the coils. The scrubber on the pickle line has an HCl control efficiency of 99%. Without the scrubber potential HCL emissions, and consequently individual hazardous air pollutant (HAP) emissions, would be over 15 tons annually. This is based on a tested controlled emission rate of 0.036 pound per hour, extrapolated to an uncontrolled emission rate of 3.6 pounds per hour and 8760 hours of annual operation.

Requiring the use of the scrubber through a federally enforceable permit to install and operate (FEPTIO) will keep HAPs emissions below major stationary source emission threshold levels.

This is an air renewal application. Allowable PE and particulate emissions 10 microns in diameter or less (PM10) emissions from the scrubber stack will remain at 0.6 ton per year (tpy). HCl allowable emissions from the scrubber stack will remain at 8.8 tpy. The PE and PM10 allowable emissions limit from the scale breaker baghouse will remain at 8.8 tpy. Allowable VOC emissions stay at 30.7 tpy. Per OAC 3745-17-08, there is a 0.030 gr/dscf limit for particulate emissions.

5. Conclusion:

A draft permit should be issued for emissions unit P901 at Worthington Steel with federally enforceable limitations of the HAP and HCL.

6. Please provide additional notes or comments as necessary:

40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling will not apply to this unit as the required use of the scrubber will ensure HAP emissions will not exceed 10 TPY of individual HAP and 25 TPY combined HAP emissions and also avoid being subject to Title V permitting.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	30.7
PE/PM10	9.4
HCl	8.8

PUBLIC NOTICE

4/24/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Worthington Steel Company

350 LAWTON AVENUE,

Monroe, OH 45050

Butler County

FACILITY DESC.: All Other Miscellaneous Fabricated Metal Product Manufacturing

PERMIT #: P0109660

PERMIT TYPE: Renewal

PERMIT DESC: Renewal of FEPTIO for Pickle Line with Scalebreaker, Baghouse and Scrubber

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: Paul Tedtman, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777



**Ohio**

**Environmental  
Protection Agency**

**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Worthington Steel Company**

Facility ID:	1409070344
Permit Number:	P0109660
Permit Type:	Renewal
Issued:	4/24/2012
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
Worthington Steel Company

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. P901, HCl Pickle Line w/ Baghouse & Scrubber ..... 11



## Authorization

Facility ID: 1409070344

Application Number(s): A0043576

Permit Number: P0109660

Permit Description: Renewal of FEPTIO for Pickle Line with Scalebreaker, Baghouse and Scrubber

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 4/24/2012

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:

Worthington Steel Company  
350 LAWTON AVENUE  
Monroe, OH 45050

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:

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

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: P0109660

Permit Description: Renewal of FEPTIO for Pickle Line with Scalebreaker, Baghouse and Scrubber

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

**Emissions Unit ID:**

**P901**

Company Equipment ID:

HCl Pickle Line w/ Baghouse & Scrubber

Superseded Permit Number:

P0097268

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 Southwest Ohio Air Quality Agency 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.

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<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. P901, HCl Pickle Line w/ Baghouse& Scrubber

Operations, Property and/or Equipment Description:

HCl Pickle Line with Scale Breaker Baghouse and Scrubber -

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

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

a. d)(5) and d)(6).

(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)(3), c)(4), d)(2), and e)(4).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) from the scrubber stack shall not exceed 0.3 pound per hour and 0.6 ton per year (TPY).</p> <p>Particulate emissions 10 microns or less in diameter (PM10) from the scrubber stack shall not exceed 0.3 pound per hour and 0.6 TPY.</p> <p>Particulate emissions (PE) from the scale breaker baghouse shall not exceed 2.0 pounds per hour and 8.8 TPY.</p> <p>Particulate matter emissions 10 microns or less in diameter (PM10) from the scale breaker baghouse shall not exceed 2.0 pounds per hour and 8.8 TPY.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Volatile Organic Compound (VOC) emissions shall not exceed 15 pounds per hour and 30.7 TPY.</p> <p>The hourly emission limitations are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limitations.</p>
b.	OAC rule 3745-31-05(D)	<p>Hydrochloric Acid (HCl) emissions from the scrubber stack shall not exceed 2 pounds per hour and 8.8 tons per year (TPY).</p> <p>See b)(2)b.</p>
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any fugitive emission point shall not exceed 20% opacity, as a three-minute average, except as specified by rule.
e.	OAC rule 3745-17-08(B)	Particulate emissions shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases.
f.	OAC rule 3745-17-11(C)(1) and (C)(2)	Exempt, per OAC rule 3745-17-11(C)(3).
g.	OAC rule 3745-21-09(E)	<p>The VOC content of the metal protective oil(s) employed in this emissions unit shall not exceed 2.6 pounds of VOC per gallon, excluding water and exempt solvents.</p> <p>See b)(2)a.</p>

(2) Additional Terms and Conditions

- a. The VOC content, as applied, of the metal evaporative oil(s) employed in this emissions unit shall not exceed 1.4 pounds of VOC per gallon, including water and exempt solvents.
- b. Use of a scrubber for control of pickle line HCl emissions is required at all times while the emissions unit is in operation to reduce the Potential-To-Emit below major stationary source emission threshold levels.

## c) Operational Restrictions

- (1) The maximum annual metal protective oil(s) usage shall not exceed 43,800 gallons per year, including water and exempt solvents.
- (2) The maximum annual production rate of steel in this emissions unit shall not exceed 1,100,000 tons per year.
- (3) The static pressure drop across the scrubber shall be continuously maintained at a value not less than the static pressure drop established during the most recent emission test that demonstrated that the emissions unit was in compliance (but not less than 1 inch of water column), at all times while the emissions unit is in operation.
- (4) The scrubber water flow rate shall be continuously maintained at a value not less than the scrubber water flow rate established during the most recent emissions test that demonstrated compliance at all times while the emissions unit is in operation.
- (5) The pressure drop across the scale breaker baghouse shall be maintained at a value not less than the pressure drop established during the most recent emission test that demonstrated that the emissions unit was in compliance or the manufacturer's recommendation at all times while the emissions unit is in operation.

## d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification number of each metal protective oil;
  - b. the VOC content of each metal protective oil (excluding water and exempt solvents), as applied;
  - c. the VOC content of each metal protective oil (including water and exempt solvents), as applied;
  - d. the number of gallons employed (including water and exempt solvents), as applied;
  - e. the monthly VOC emissions from the use of metal protective oil(s) [summation of c. x d. for each metal protective oil]; and
  - f. the monthly production, in tons per month.

These monthly records shall be summarized at the end of each calendar year.

- (2) The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber (in inches of water column) and the scrubber water flow rate (in gallons per minute) for the scrubber employed for this emissions unit, while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s).

The permittee shall collect and record the following information:

- a. the pressure drop across the scrubber, in inches of water, on a once per shift basis;
  - b. the scrubber water flow rate, in gallons per minute, on a once per shift basis; and
  - c. the operating times for the capture (collection) system, control device, monitoring equipment and the associated emissions unit.
- (3) The permittee shall properly operate and maintain equipment to monitor the pressure drop across the scale breaker baghouse (in inches of water) while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.
- (4) The permittee shall collect and record the following information each calendar year for this emissions unit:
- a. the total annual VOC emissions, in tons;
  - b. the total annual production of steel, in tons; and
  - c. the total annual usage of metal protective oils.
- (5) The permit to install for this emissions unit P901 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 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 SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hydrochloric Acid

TLV (ug/m3): 7500

Maximum Hourly Emission Rate (lbs/hr): 2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 16.6

MAGLC (ug/m3): 179

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (6) 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
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

## e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall include in the annual PER any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a statement shall be included stating that no changes were made.
- (4) The permittee shall identify in the PER any periods of time during which the static pressure drop across the scrubber or the scrubber flow rate was not maintained at or above the levels required by this permit.
- (5) The permittee shall identify in the PER any periods of time during which the pressure drop across the scale breaker baghouse did not comply with the allowable range required by this permit.
- (6) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the hourly HCL emission rate; and
    - ii. any hours of operation of the pickle line without the use of the scrubber as described in (b)(2).
  - 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).
  - e. 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 Ohio EPA district office or local air agency).

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the stack visible particulate emission limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emission Limitation:

Visible particulate emissions from any fugitive emissions point shall not exceed 20% opacity, as a three-minute average, except as specified by rule.

Applicable Compliance Method:

c. Compliance with the stack visible particulate emission limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

Emission Limitation:

HCl emissions from the scrubber stack shall not exceed 2 pounds per hour and 8.8 TPY.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. the emission testing shall be conducted within one year after issuance of this permit; and

- ii. the emission testing shall be conducted to demonstrate compliance with the pound per hour of HCl emission rate from the scrubber stack.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Methods 1-4 and 26 for HCl.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

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 appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

The TPY emissions are determined by multiplying the hourly emission rate by 8760 hours per year then dividing by 2000 pounds per ton.

- d. Emission Limitation:

Particulate emissions (PE) from the scrubber stack shall not exceed 0.3 pound per hour and 0.6 ton TPY.

Particulate emissions 10 microns or less in diameter (PM10) from the scrubber stack shall not exceed 0.3 pound per hour and 0.6 TPY.

**Applicable Compliance Method:**

Compliance shall be determined by multiplying the PM/PM10 emission factor of 0.001 pound per ton (company supplied emission factor) by the maximum hourly production rate of 260 tons per hour. The annual PM/PM10 emissions are determined by multiplying 0.001 pound per ton by the annual production limitation of 1,100,000 tons per year and then dividing by 2000 pounds per ton.

**e. Emission Limitation:**

Particulate emissions (PE) from the scale breaker baghouse shall not exceed 2.0 pounds per hour and 8.8 TPY.

Particulate matter emissions 10 microns or less in diameter (PM10) from the scale breaker baghouse shall not exceed 2.0 pounds per hour and 8.8 TPY.

**Applicable Compliance Method:**

Compliance with the pounds per hour emission rate is determined based upon the emission factor of 2 pounds per hour of PM/PM10 provided in PTI application 14-04816. The annual emissions are determined by multiplying the hourly emission rate by 8760 hours per year then dividing by 2000 pounds per ton.

**f. Emission Limitation:**

Volatile Organic Compound (VOC) emissions shall not exceed 15 pounds per hour and 30.7 TPY.

**Applicable Compliance Method:**

Compliance with the hourly limitation is determined by multiplying the maximum coating usage rate of 10.7 gallons per hour by 1.4 pounds of VOC per gallon. Compliance with the annual emission limitation is determined by the recordkeeping in d)(1).

**g. Emission Limitation:**

The VOC content of the metal protective oil(s) employed in this emissions unit shall not exceed 2.6 pounds of VOC per gallon, excluding water and exempt solvents.

**Applicable Compliance Method:**

USEPA Methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.



h. Emission Limitation:

The maximum annual metal protective oil(s) usage shall not exceed 43,800 gallons per year, including water and exempt solvents.

Applicable Compliance Method:

Compliance with the usage limitation shall be determined by the record keeping requirements in d)(1).

i. Emission Limitation:

The maximum annual production rate of steel in this emissions unit shall not exceed 1,100,000 tons per year.

Applicable Compliance Method:

Compliance with the production rate limitation shall be determined by the record keeping requirements in d)(1).

g) Miscellaneous Requirements

(1) None.