

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 06-08306

A. Source Description

Skyline Steel, LLC will be operating in Belpre, OH in Washington County. This facility has not yet been constructed and construction is anticipated to commence once they receive their PTI. They intend to operate four joined spray booths, each with an individual outlet. The spray booths will be combined, due to the spray booth manufacturer's restrictions of twenty foot length per booth. Since Skyline may coat steel plates up to 80 feet long, up to four booths may be necessary.

B. Facility Emissions and Attainment Status

The facility is located in Belpre in Washington County. All of Washington County is an Appendix A area. Washington County is also non-attainment for PM 2.5 and is attainment for all other criteria pollutants.

C. Source Emissions

The permittee has requested synthetic minor restrictions on the coating and cleanup usage to ensure that the emissions of HAP do not exceed MACT and Title V thresholds. They will be limited to 8760 gallons of coating and 720 gallons of cleanup per rolling, 12-month period.

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	19.5
Total HAP	19.5
Single HAP	9.2
PE	2.4

D. Conclusion

The operational restrictions, emissions limits, and record keeping requirements in this permit provide federally enforceable limits that are sufficient to limit the potential to emit below TV and MACT thresholds



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 06-08306

Fac ID: 0684010138

DATE: 1/3/2008

Skyline Steel LLC
Naomi Davis
12355 State Route 7
Belpre, OH 45714-9473

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 **\$200** 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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

SEDO

WV

PA

WASHINGTON COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **06-08306** FOR AN AIR CONTAMINANT SOURCE
FOR **Skyline Steel LLC**

On 1/3/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Skyline Steel LLC**, located at **12355 State Route 7, Belpre, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-08306:

Spray booths and spray equipment for coating of steel.

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.

Bruce Weinberg, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138
[(740)385-8501]



**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 06-08306

Application Number: 06-08306
Facility ID: 0684010138
Permit Fee: **To be entered upon final issuance**
Name of Facility: Skyline Steel LLC
Person to Contact: Naomi Davis
Address: 12355 State Route 7
Belpre, OH 45714-9473

Location of proposed air contaminant source(s) [emissions unit(s)]:
**12355 State Route 7
Belpre, Ohio**

Description of proposed emissions unit(s):
Spray booths and spray equipment for coating of steel.

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

Skyline Steel LLC

PTI Application: 06-08306

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0684010138

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

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

Skyline Steel LLC

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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>
VOC	19.5
Total HAP	19.5
Single HAP	9.2
PE	2.4

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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 operations(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 - Steel Coating Line, four 20ft spray booths, vented to a paper filter.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Emissions shall not exceed:</p> <p>16.7 lbs/hr of volatile organic compounds (VOC) from coating and cleanup, as a daily average; 16.7 lb/hr of total hazardous air pollutants (HAP) from coating and cleanup, as a daily average; and 7.9 lb/hr of any individual HAP from coating and cleanup, as a daily average.</p> <p>The requirements established pursuant to this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1).</p>
OAC rule 3745-21-09(U)(1)	See Section A.I.2.a below.
OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 0.551 pounds per hour.
OAC rule 3745-17-07(A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V)	<p>Emissions shall not exceed the following as a rolling, 12-month summation:</p> <p>19.5 tons of VOC; 19.5 tons of total HAP; and 9.2 tons of an individual HAP.</p> <p>See Section B.2 below.</p>
ORC 3704.03 (T)(4)	See Section A.2.b below

2. Additional Terms and Conditions

- 2.a** The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
- 2.b** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE emissions from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking in to account the federally enforceable rule limit of 0.551 pounds per hour under OAC rule 3745-17-11(B)(1).

B. Operational Restrictions

- The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation.
- The maximum annual coating usage for this emissions unit shall not exceed 8760 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual cleanup usage for this emissions unit shall not exceed 720 gallons, based upon a rolling, 12-month summation of the cleanup usage figures.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating and cleanup usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage Usage</u>	<u>Cumulative Cleanup</u>
1	730 gallons	60 gallons
1-2	1,460 gallons	120 gallons
1-3	2,190 gallons	180 gallons
1-4	2,920 gallons	240 gallons
1-5	3,650 gallons	300 gallons
1-6	4,380 gallons	360 gallons
1-7	5,110 gallons	420 gallons
1-8	5,840 gallons	480 gallons
1-9	6,570 gallons	540 gallons
1-10	7,300 gallons	600 gallons

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1-11	8,030 gallons	660 gallons
1-12	8,760 gallons	720 gallons

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating and cleanup usage limitations shall be based upon a rolling, 12-month summation of the coating and cleanup usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. 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.
2. 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 mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
 - c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{VOC,2})_A = \frac{\sum_{i=1}^n C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi})}{\sum_{i=1}^n L_{Ci} (V_{Si} + V_{VOCi})}$$

where:

$(C_{VOC,2})_A$ = daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$$

where:

Emissions Unit ID: **K001**

D_C is the density of coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

V_S is the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

W_{VM} weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period "t".

L_C = liquid volume of coating employed during time period "t", in gallons of coating.

M_C = mass of coating employed during the time period "t", in pounds of coating.

i = subscript denoting a specific coating employed during time period "t".

n = total number of coatings employed during time period "t".

t = time period specified for the weighted average VOC content.

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3. The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in this emissions unit:
 - a. the name and identification of each coating and cleanup material;
 - b. the number of gallons of coatings;
 - c. the number of gallons of cleanup materials;
 - d. the VOC content, as applied, in pounds per gallon;
 - e. the individual HAP content, for each HAP, in pounds per gallon;
 - f. total HAP content, in pounds per gallon;
 - g. the total VOC emissions from all coatings and cleanup materials employed [the sum of (b. x d.) for all coatings and (c. x d.) for all cleanup materials] divided by 2000, in tons;
 - h. the individual HAP emissions from all coatings and cleanup materials employed [the sum of (b. x e.), for each HAP in all coatings and (c. x e.) for each HAP in all cleanup materials] divided by 2000, in tons;
 - i. the total HAP emissions from all coatings and cleanup materials employed [the sum of (b. x f.) for all coatings and (c. x f.) for all cleanup materials] divided by 2000, in tons;
 - j. during the first 12 months after the startup of this emissions unit, the cumulative total number of gallons of coating employed since startup;
 - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total number of gallons of coating employed;
 - l. during the first 12 months after the startup of this emissions unit, the cumulative total number of gallons of cleanup material employed since startup;
 - m. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total gallons of cleanup material employed;
 - n. during the first 12 months of operation following the issuance of this permit the cumulative total VOC emissions;

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- o. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the total VOC emissions;
 - p. during the first 12 months of operation following the issuance of this permit the cumulative total individual and total HAP emissions; and
 - q. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month summation of the individual and total HAP emissions.
4. The permit to install for emissions unit K001 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour work week, for each toxic compound emitted from the emissions units (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

Emissions Unit ID: **K001**

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):
- $$\text{TLV OVER 10} \sim \text{TIMES} \left\{ \frac{8 \text{ OVER } X}{4} \right\} \sim \text{TIMES} \left\{ \frac{5 \text{ OVER } Y}{4} \right\} \sim \text{MAGLC}$$
- d. The following summarizes the results of dispersion modeling for the "worst case" toxic contaminant:

Compound: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 4.93

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 347

MAGLC (ug/m3): 4476

The permittee has demonstrated that emissions of toluene are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

5. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - 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

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3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous permitted level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

6. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

Emissions Unit ID: **K001**

7. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

D. Reporting Requirements

1. The permittee shall notify the Director (Southeast District Office) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.
2. The permittee shall notify the Director (Southeast District Office) in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Southeast District Office) within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports which identify:
 - a. all exceedances of the rolling, 12-month limitation on coating and cleanup usage ; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating and cleanup usage levels.
 - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the rolling, 12-month limitation of the VOC emissions from coatings and cleanup materials.
 - c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the rolling, 12-month limitation of the total HAP and individual HAP emissions from coatings and cleanup materials.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

4. The permittee shall submit annual reports which identify:

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- a. The actual annual VOC emissions from this emissions unit;
- b. The actual annual HAP emissions from this emissions unit; and
- c. Any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.

The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.2.
 - b. Emissions Limitation:
Emissions shall not exceed:

16.7 lbs/hr of volatile organic compounds (VOC) from coating and cleanup, as a daily average;
16.7 lb/hr of total hazardous air pollutants (HAP) from coating and cleanup, as a daily average; and
7.9 lb/hr of any individual HAP from coating and cleanup, as a daily average.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.2 and A.III.3.
 - c. Emission Limitation:
Particulate emissions (PE) shall not exceed 0.551 pounds per hour.

Emissions Unit ID: **K001**

Applicable Compliance Method:

To determine the worst case PE rate, 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 = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.50); and

CE = fractional control efficiency of the control equipment (0.99).

If requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

d. Emissions Limitation:

Emissions shall not exceed the following as a rolling, 12-month summation:

19.5 tons of VOC;
19.5 tons of total HAP; and
9.2 tons of an individual HAP.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section A.III.3.

e. Emission Limitation:

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

Applicable Compliance Method:

If requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

2. US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

F. Miscellaneous Requirements

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

None

Skyline Steel LLC

Facility ID: 0684010138

PTI Application: 06-08306

Issued: To be entered upon final issuance

Emissions Unit ID: K001

SIC CODE 3316 SCC CODE 40202501 EMISSIONS UNIT ID K001
 EMISSIONS UNIT DESCRIPTION Steel Coating Line, four 20ft spray booths, vented to a paper filter.
 DATE INSTALLED after issuance of permit

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		0.551 lbs/hour	2.4		
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		16.7 lbs/hr	19.5	16.7 lbs/hr	19.5
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics		16.7 lbs/hr	19.6	16.7 lbs/hr	19.6

APPLICABLE FEDERAL RULES:

NSPS? no

NESHAP? no

PSD? no

OFFSET POLICY? no

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

Compliance with the terms and conditions of this permit, synthetic minor to avoid MACT and Title V.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:

toluene