Facility ID: 1652000030 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

Go to Part II for Emissions Unit P001
Go to Part II for Emissions Unit P002
Go to Part II for Emissions Unit P003

Facility ID: 1652000030 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.

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) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P001 - HCl pickle line with contact roll oiling system.	OAC rule 3745-31-05(A)(3) (PTI 16-02319)	22.75 pounds of volatile organic compounds (VOC) per hour The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07 and OAC rule 3745-21-07(G)(2).
	OAC rule 3745-35-07(B)	0.5 pound of hydrochloric acid (HCl) per hour from the scrubber stack 2.19 tons of HCl per year from the scrubber stack Fugitive emissions of HCl from emissions units P001 and P002 shall not exceed 0.1 ton per year. The annual VOC input rate* and the annual VOC emissions each shall not exceed 93.0 tons of VOC per rolling, 12-month summation for emissions units P001 and P002 combined (See A.2.b below). *Annual rust preventive oil usage is based upon a VOC input rate that is equivalent to the annual VOC emission rate and is based upon the following: VOC input rate = (C) x (D) where C = the number of gallons of each rust preventive oil employed and D = the VOC content of each rust preventive oil employed in pounds of VOC per gallon of rust preventive oil where 100% of the volatile solvents in the rust preventive oil employed is emitted.
	OAC rule 3745-21-07(G)(2)	See B.4 below.

2. **Additional Terms and Conditions**

   (a) The hourly VOC emission limitation regulated per OAC rule 3745-31-05(A)(3) is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.
   Both the annual rust preventive oil usage VOC input rate* and the annual emissions of VOC for emissions units P001 and P002 combined shall not exceed 93.0 tons per year, based upon a rolling, 12-month summation of the monthly VOC input rates and VOC emissions, respectively. The permittee has existing rust preventive oil usage VOC input* records and therefore does not need to be limited to first year monthly rust preventive oil usage VOC input* amounts.

B. **Operational Restrictions**

1. The pH of the scrubber liquor shall be maintained within the range of 0.4 to 7.5.

2. The pressure drop across the scrubber shall be continuously maintained at a value of not less than one half inch of water or not less than the minimum static pressure drop established during the most recent emission test that demonstrated that the emissions unit was in compliance at all times while the emissions unit is in operation.

3. The scrubber water flow rate shall be continuously maintained at a value of not less than125 gallons per minute or not less than the minimum water flow rate value established during the most recent emission test that demonstrated that the emissions unit was in compliance at all times while the emissions unit is in operation.

4. The permittee shall not employ any photochemically reactive materials, as defined by OAC rule 3745-21-01(C)(5), in this emissions unit.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information monthly for emissions units P001 and P002:

a. the name and identification number of each rust preventive oil employed;

b. the VOC content of each rust preventive oil employed, in pounds per gallon, as applied;

c. the amount of each rust preventive oil employed, in gallons;

d. the total VOC input amounts* and the total VOC emissions, in tons, from all the rust preventive oils employed; and

e. the rolling, 12-month VOC input rate* and the rolling, 12-month total VOC emissions, in tons, from all the rust preventive oils employed.

2. The permittee shall properly operate and maintain equipment to monitor the pH of the scrubber liquor while the emissions unit (HCl pickle line) is in operation. The pH monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

a. the pH of the scrubber liquor, on a once per shift basis; and

b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit (HCl pickle line) is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

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.

4. The permittee shall maintain the following information for this emissions unit:

a. the MSDS sheets for each liquid organic material employed; and

b. documentation as to whether or not each material is a photochemically reactive material, as defined by OAC rule 3745-21-01(C)(5).

5. The permit to install for this emissions unit (P001) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit 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 SCREEN 3.0 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 (mg/m3): 5.49

Maximum Hourly Emission Rate (lbs/hr): 0.89*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 94.7

MAGLC (ug/m3): 130.7

*Increase in hydrochloric acid emission rates for P001, P002, and P003.

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 still 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 (typically for coatings or cleanup materials), 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.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 93.0 tons and the rolling, 12-month VOC input rate limitation of 93.0 tons.

2. The permittee shall submit pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above.

3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

   a. the static pressure drop across the scrubber; and

   b. the scrubber water flow rate.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a "photochemically reactive material" (as defined in OAC rule 3745-21-01(C)(5)) is employed in this emissions unit . The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a rust preventive oil which exceeds the VOC content specified in section A.1 of these terms and conditions is employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after such an occurrence.

6. The permittee shall also submit annual reports which specify the total VOC emissions from emissions units P001 and P002 combined and the total HCl emissions from emissions units P001, P002, and P003 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

7. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

E. **Testing Requirements**

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

   a. The emission testing shall be conducted 6 months prior to permit renewal.

   b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for HCl.

   c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for HCl, Methods 1-4 and 26A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

   d. 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.

2. 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).

3. 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.

4. 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.

5. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

22.75 pounds of VOC per hour

Applicable Compliance Method:

Multiply the allowable VOC content of the rust preventive oil 5.0 pounds of VOC per gallon of rust preventive oil by the maximum hourly rust preventive oil usage.
Emission Limitation:

The annual VOC input rate* and the annual VOC emissions each shall not exceed 93.0 tons of VOC per rolling, 12-month summation for emissions units P001 and P002 combined.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monthly record keeping as required by section C.1 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the rust preventive oils.
Emission Limitation:

0.5 pound of HCl per hour from the scrubber stack

Applicable Compliance Method:

Compliance with the allowable mass emission rate for HCl shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 26A as required by section E.1 of these terms and conditions.
Emission Limitation:

2.19 tons of HCl per year from the scrubber stack

Applicable Compliance Method:

Multiply the allowable hourly emission limitation by 8760 hours per year, then divide by 2000 pounds per ton.
Emission Limitations:

Fugitive emissions of HCl from emissions units P001 and P002 shall not exceed 0.1 ton per year.

Applicable Compliance Method:

Compliance with the fugitive emissions of HCl shall be determined by employing Method 7903 IC from the National Institute of Occupational Safety and Health's Manual of Analytical Methods to determine the concentration of HCl in the area the steel pickling line and through the calculation method provided by Viking Worthing Steel Enterprise in the Permit to Install 16-02319 application.

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable pursuant to OAC rule 3745-35-07: A.1, A.2.b, B.1, B.2, B.3, B.4, C.1, C.2, C.3, C.4, D.1, D.2, D.3, D.4, D.5, D.6, E.1, E.2, E.3, and E.4.

Facility ID: 1652000030 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.

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) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P002 - HCl pickle line with electrostatic oiling system.	OAC rule 3745-31-05(A)(3) (PTI 16-02319)	52.5 pounds of volatile organic compounds (VOC) per hour The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07 and OAC rule 3745-21-07(G)(2).
	OAC rule 3745-35-07(B)	0.68 pound of hydrochloric acid (HCl) per hour from the scrubber stack 2.98 tons of HCl per year from the scrubber stack Fugitive emissions of HCl from emissions units P001 and P002 shall not exceed 0.1 ton per year. The annual VOC input rate* and the annual VOC emissions each shall not exceed 93.0 tons of VOC per rolling, 12-month summation for emissions units P001 and P002 combined (See A.2.b below). *Annual rust preventive oil usage is based upon a VOC input rate that is equivalent to the annual VOC emission rate and is based upon the following: VOC input rate = (C) x (D) where C = the number of gallons of each rust preventive oil employed and D = the VOC content of each rust preventive oil employed in pounds of VOC per gallon of rust preventive oil where 100% of the volatile solvents in the rust preventive oil employed is emitted.
	OAC rule 3745-21-07(G)(2)	See B.4 below.

2. **Additional Terms and Conditions**

   (a) The hourly VOC emission limitation regulated per OAC rule 3745-31-05(A)(3) is based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with this limit.
   Both the annual rust preventive oil usage VOC input rate* and the annual emissions of VOC for emissions units P001 and P002 combined shall not exceed 93.0 tons per year, based upon a rolling, 12-month summation of the monthly VOC input rates and VOC emissions, respectively. The permittee has existing rust preventive oil usage VOC input* records and therefore does not need to be limited to first year monthly rust preventive oil usage VOC input* amounts.

B. **Operational Restrictions**

1. The pH of the scrubber liquor shall be maintained within the range of 0.4 to 7.5.

2. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 3.7 inches of water or not less than the minimum static pressure drop established during the most recent emission test that demonstrated that the emissions unit was in compliance at all times while the emissions unit is in operation.

3. The scrubber water flow rate shall be continuously maintained at a value of not less than 180 gallons per minute or not less than the minimum water flow rate value established during the most recent emission test that demonstrated that the emissions unit was in compliance at all times while the emissions unit is in operation.

4. The permittee shall not employ any photochemically reactive materials, as defined by OAC rule 3745-21-01(C)(5), in this emissions unit.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information monthly for emissions units P001 and P002:

   a. the name and identification number of each rust preventive oil employed;

   b. the VOC content of each rust preventive oil employed, in pounds per gallon, as applied;

   c. the amount of each rust preventive oil employed, in gallons;

   d. the total VOC input amounts* and the total VOC emissions, in tons, from all the rust preventive oils employed; and

   e. the rolling, 12-month VOC input rate* and the rolling, 12-month total VOC emissions, in tons, from all the rust preventive oils employed.

2. The permittee shall properly operate and maintain equipment to monitor the pH of the scrubber liquor while the emissions unit (HCl pickle line) is in operation. The pH monitor shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

   The permittee shall collect and record the following information each day:

a. the pH of the scrubber liquor, on a once per shift basis; and

b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

3. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit (HCl pickle line) is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

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.

4. The permittee shall maintain the following information for this emissions unit:

a. the MSDS sheets for each liquid organic material employed; and

b. documentation as to whether or not each material is a photochemically reactive material, as defined by OAC rule 3745-21-01(C)(5).

5. The permit to install for this emissions unit (P002) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit 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 SCREEN 3.0 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 (mg/m3): 5.49

Maximum Hourly Emission Rate (lbs/hr): 0.89*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 94.7

MAGLC (ug/m3): 130.7

*Increase in hydrochloric acid emission rates for P001, P002, and P003.

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 still 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 (typically for coatings or cleanup materials), 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.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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.

D. **Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation of 93.0 tons and the rolling, 12-month VOC input rate limitation of 93.0 tons.

2. The permittee shall submit pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above.

3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

   a. the static pressure drop across the scrubber; and

   b. the scrubber water flow rate.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a "photochemically reactive material" (as defined in OAC rule 3745-21-01(C)(5)) is employed in this emissions unit . The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a rust preventive oil which exceeds the VOC content specified in section A.1 of these terms and conditions is employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after such an occurrence.

6. The permittee shall also submit annual reports which specify the total VOC emissions from emissions units P001 and P002 combined and the total HCl emissions from emissions units P001, P002, and P003 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

7. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

E. **Testing Requirements**

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

   a. The emission testing shall be conducted 6 months prior to permit renewal.

   b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for HCl.

   c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for HCl, Methods 1-4 and 26A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

   d. 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.

2. 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).

3. 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.

4. 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.

5. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
   Emission Limitation:

   52.5 pounds of VOC per hour

   Applicable Compliance Method:

   Multiply the allowable VOC content of the rust preventive oil 5.0 pounds of VOC per gallon of rust preventive oil by the maximum hourly rust preventive oil usage.
   Emission Limitation:

   The annual VOC input rate* and the annual VOC emissions each shall not exceed 93.0 tons of VOC per rolling, 12-month summation for emissions units P001 and P002 combined.

   Applicable Compliance Method:

   Compliance shall be demonstrated based upon the monthly record keeping as required by section C.1 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the rust preventive oils.
   Emission Limitation:

   0.68 pound of HCl per hour from the scrubber stack

Applicable Compliance Method:

Compliance with the allowable mass emission rate for HCl shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 26A as required by section E.1 of these terms and conditions.
Emission Limitation:

2.98 tons of HCl per year from the scrubber stack

Applicable Compliance Method:

Multiply the allowable hourly emission limitation by 8760 hours per year, then divide by 2000 pounds per ton.
Emission Limitations:

Fugitive emissions of HCl from emissions units P001 and P002 shall not exceed 0.1 ton per year.

Applicable Compliance Method:

Compliance with the fugitive emissions of HCl shall be determined by employing Method 7903 IC from the National Institute of Occupational Safety and Health's Manual of Analytical Methods to determine the concentration of HCl in the area the steel pickling line and through the calculation method provided by Viking Worthing Steel Enterprise in the Permit to Install 16-02319 application.

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable pursuant to OAC rule 3745-35-07: A.1, A.2.b, B.1, B.2, B.3, B.4, C.1, C.2, C.3, C.4, D.1, D.2, D.3, D.4, D.5, D.6, E.1, E.2, E.3, and E.4.

Facility ID: 1652000030 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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) None.

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) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P003 - Acid Regeneration Roaster.	OAC rule 3745-31-05(A)(3) (PTI 16-02319)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-35-07.
	OAC rule 3745-35-07(B)	1.0 pound of hydrochloric acid (HCl) per hour from the scrubber stack 4.38 tons of HCl per year from the scrubber stack Fugitive emissions of HCl from emissions unit P003 shall not exceed 0.1 ton per year.

2. **Additional Terms and Conditions**

(a) None

B. **Operational Restrictions**

1. The permittee shall only employ potable water supplied by the local water district as the scrubber liquor.

2. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 2 inches of water or not less than the minimum static pressure drop established during the most recent emission test that demonstrated that the emissions unit was in compliance at all times while the emissions unit is in operation.

3. The scrubber water flow rate shall be continuously maintained at a value of not less than 265 gallons per minute or not less than the minimum water flow rate value established during the most recent emission test that demonstrated that the emissions unit was in compliance at all times while the emissions unit is in operation.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

   The permittee shall collect and record the following information each day:

   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.

2. The permit to install for this emissions unit (P003) was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit 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 SCREEN 3.0 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 (mg/m3): 5.49

   Maximum Hourly Emission Rate (lbs/hr): 0.89*

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 94.7

   MAGLC (ug/m3): 130.7

   *Increase in hydrochloric acid emission rates for P001, P002, and P003.

   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 still 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 (typically for coatings or cleanup materials), 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.).

   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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

   a. the static pressure drop across the scrubber; and

   b. the scrubber water flow rate.

2. The permittee shall also submit annual reports which specify the total HCl emissions from emissions units P001, P002, and P003 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and

Conditions of this permit.

E. **Testing Requirements**

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

   a. The emission testing shall be conducted within 3 months after start-up.

   b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for HCl.

   c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: for HCl, Methods 1-4 and 26A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

   d. 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.

2. 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).

3. 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.

4. 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.

5. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
   Emission Limitation:

   1.0 pound of HCl per hour from the scrubber stack

   Applicable Compliance Method:

   Compliance with the allowable mass emission rate for HCl shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 26A as required by section E.1 of these terms and conditions.
   Emission Limitation:

   4.38 tons of HCl per year from the scrubber stack

   Applicable Compliance Method:

   Multiply the allowable hourly emission limitation by 8760 hours per year, then divide by 2000 pounds per ton.
   Emission Limitations:

   Fugitive emissions of HCl from emissions unit P003 shall not exceed 0.1 ton per year.

   Applicable Compliance Method:

   Compliance with the fugitive emissions of HCl shall be determined by employing Method 7903 IC from the National Institute of Occupational Safety and Health's Manual of Analytical Methods to determine the concentration of HCl in the area the steel pickling line and through the calculation method provided by Viking Worthing Steel Enterprise in the Permit to Install 16-02319 application.

F. **Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable pursuant to OAC rule 3745-35-07: A.1, B.1, B.2, B.3, C.1, D.1, D.2, E.1, E.2, E.3, and E.4.