

SYNTHETIC MINOR DETERMINATION

Armco - Dover Operations

- A. Emissions Unit Description: Armco operates a steel galvanizing facility in Dover, Ohio. They operate two gas fired boilers (B001 and B004), and a galvanizing line (historically P008) which has been divided so that now P008 covers only the galvanizing kettle while P011 covers the cleaning, pickling and fluxing section. Thirteen annealing furnaces for steel coils and the associated Dx generators which provide a noncorrosive atmosphere, are included in P004. The facility has recently shut down a second galvanizing line.
- B. Facility and Emissions Unit Emissions: Potential emissions from the facility exceed the Title V thresholds for both NO_x and HCl. With the shutdown and removal of one galvanizing line and Armco's formalizing of the elimination of coal burning at the facility by not renewing the permit for the coal-fired boiler which will be dismantled, their PTE for other pollutants is not an issue. Calculations and a summary table are attached.
- C. Emissions Unit Limitations: The facility is restricted by federally enforceable STC's to limit rolling 12-month natural gas usage, for which they must keep monthly records and submit excursion reports. This will ensure NO_x emissions will not exceed 100 TPY, even with all other equipment burning natural gas calculated at full time, maximum operation. They are also given an emission limit for hydrogen chloride on the cleaning section of the galvanizing line. This has been controlled by a scrubber since 1977 but previously had no regulatory limit.
- D. Conclusions: The emission limits contained in these FESOP's are adequate to provide a federally enforceable framework for assuring that applicable Title V thresholds will not be exceeded.

POTENTIAL TO EMIT

Pollutant	PTE	FESOP PTE	Comments
PM	75.2		
SO ₂	0.5		
NO _x	108.9	96.0	All emissions from fuel burning. B001 and B004 will be limited to 600 mmcf natural gas usage per 12-month period. All other EUs calculated at maximum, full-time operation.
CO	25.3		
VOC	5.8		
HCL	27.2	9.6	All emissions from HCl cleaning of strip. PTE is based on estimated uncontrolled emissions, which are unregulated. P011 will be limited to 2.2 # per hour (9.64 TPY @ 8760 hr/yr).
HAPs	27.2	9.6	HCl is the only HAP emitted. See above.