

A. Operational restrictions

1. Combined volatile organic compound (VOC) emissions from sources P023 through P030 shall not exceed 40.4 tons per year. This allowable limit is based on a 4% concentration of oil in the liquid coolant, and VOC content of 1.21 lbs of VOC per gallon of slushing oil (0.16 lbs of VOC per 1.0 lb oil).

B. Record keeping requirements

1. The permittee shall collect and record the following information each month for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.
2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:
 - a. The number of gallons (excluding water and exempt solvents) of each coating employed.
 - b. The total VOC emissions from all coatings employed, in pounds or tons.
3. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five (5) 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 the permit. Such records may be maintained in computerized form.

C. Reporting requirements

1. The permittee shall also submit annual reports to the Central District Office of the Ohio EPA which summarize the total VOC emissions from the emissions units P023, P024, P025, P026, P027, P028, P029, and P030, for the previous calendar year. These reports shall be submitted by January 31 of each year.
2. 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 Ohio EPA Central District Office.
- b. 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 Ohio EPA Central District Office. 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 quarterly, i.e., 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.)

D. Testing requirements

1. Compliance with the emission limitation(s) of the terms and conditions shall be determined in accordance with the following methods.
 - a. Emission Limitation:
Combined facility wide VOC emissions of 40.4 tons per year

Applicable Compliance Method:

Multiply the VOC content (lbs/gallon) with the amount of oil applied per year (gallons/year). OAC rule 3745-21-10(B), USEPA Method 24 shall be used to determine the VOC contents for coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, 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.

- b. Emission Limitation:
 P023: 13.4 lbs VOC/day, P024: 15.6 lbs VOC/day,
 P025: 105 lbs VOC/day P026: 26 lbs VOC/day, P027:
 10.6 lbs VOC/day, P028: 15 lbs VOC/day, P029: 20
 lbs VOC/day, and P030: 16 lbs VOC/day.

Applicable Compliance Method:

The VOC emission limit (lbs/day) for all the sources was established at maximum capacity or potential to emit. The rust preventative oil used at the facility contains mineral/oil mist, a toxic compound, therefore it was necessary to model the facility wide sources to indicate compliance with the Ohio Air Toxics Policy. The modeling was performed for the worst case scenario at maximum potential to emit. The modeling demonstrated that the toxic impact of the proposed sources for mineral/oil mist is within maximum acceptable ground level concentration (MAGLC) limits and, meets the requirements of the Ohio Air Toxics policy. Therefore no record keeping requirements are necessary for the lb/day limitation.

PTI Number: 01-6710 Facility Name Worthington Steel Company
 Preliminary X Final

1. CONSTRUCTION STATUS (do not use with #2, 3A, or 3B)
 source name:
2. NSPS REQUIREMENTS
 source #: source description: NSPS subpart:
- 3A. NESHAP REQUIREMENTS:
 source #: source description: NESHAP reg.:
- 3B. RADIONUCLIDES NESHAP REQUIREMENTS:
 source #: source description:
4. PERFORMANCE TEST REQUIREMENTS:
 C. (optional) source: Pollutant(s):
 D. (optional) Tests shall include a determination of the uncontrolled mass rate of emissions.
5. MONITORING REQUIREMENTS:
 type of monitor: source:
6. PSD REQUIREMENTS:
7. APPENDIX S - EMISSION OFFSET INTERPRETIVE RULING:

- 8. RECORDS RETENTION AND AVAILABILITY:
- 9. REPORTING REQUIREMENTS:
- X10.X WASTE DISPOSAL:
- X11.X MAINTENANCE OF EQUIPMENT:
- X12.X MALFUNCTION/ABATEMENT:
- X13.X AIR POLLUTION NUISANCES PROHIBITED:
- 14. NINETY DAY OPERATING PERIOD:
- 15. GASOLINE DISPENSING FACILITIES:
- 16. DIESEL AND/OR KEROSENE DISPENSING FACILITIES:
- 17. GASOLINE DISPENSING OPERATIONS (SUBMERGED FILL ONLY)
annual limit of throughput (gallons):
- 18. MISC. STORAGE TANKS:
- 19. NSPS SUBPART Kb, 40 CFR 60.116b(a) AND (b)
source number(s): tank size max vapor pressure

In Addition:

- A. 40 CFR 60.116b(a) and (c):
source number(s): tank size max vapor pressure
- B. 40 CFR 60.116b(a) and (d):
source number(s): tank size max vapor pressure
- C. other applicable rules _____:
source number(s): tank size max vapor pressure

- 20. BAT FOR OPEN TOP VAPOR DEGREASERS:
- 21. BAT FOR COLD CLEANERS:
- 22. BAT FOR CONVEYORIZED DEGREASERS:
- 23. NOTICE OF INTENT TO RELOCATE:
- 24. ADDITIONAL TERMS AND CONDITIONS: AIR DSHWM WW

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for Worthington Steel Company located in Franklin County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification/Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control & Usage Requirements</u>
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P023	Tandem Mill	Compliance with permitted limits and applicable rules. Slushing oil VOC content and usage limitations.	3745-31-05 3745-21-09(E)	13.4 lbs VOC/day. VOC content of oil shall not exceed 1.21 lbs of VOC per gallon of oil (0.16 lbs of VOC per 1.0 lb oil). See additional terms and conditions
P024	Reversing Mill	Compliance with permitted limits and applicable rules. Slushing oil VOC content and usage limitations.	3745-31-05 3745-21-09(E)	15.6 lbs VOC/day. VOC content of oil shall not exceed 1.21 lbs of VOC per gallon of oil (0.16 lbs of VOC per 1.0 lb oil). See additional terms and conditions
P025	Temper Mill	Compliance with permitted limits and applicable rules. Slushing oil VOC content and usage limitations.	3745-31-05 3745-21-09(E)	105 lbs VOC/day. VOC content of oil shall not exceed 1.21 lbs of VOC per gallon of oil (0.16 lbs of VOC per 1.0 lb oil). See additional terms and conditions

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P026	30" Slitter	Compliance with permitted limits and applicable rules. Slushing oil VOC content and usage limitations.	3745-31-05 3745-21-09(E)	26 lbs VOC/day. VOC content of oil shall not exceed 1.21 lbs of VOC per gallon of oil (0.16 lbs of VOC per 1.0 lb oil). See additional terms and conditions
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P027	36#1 Slitter	Compliance with permitted limits and applicable rules. Slushing oil VOC content and usage limitations.	3745-31-05 3745-21-09(E)	10.6 lbs VOC/ day. VOC content of oil shall not exceed 1.21 lbs of VOC per gallon of oil (0.16 lbs of VOC per 1.0 lb oil). See additional terms and conditions
P028	36#3 Slitter	Compliance with permitted limits and applicable rules. Slushing oil VOC content and usage limitations.	3745-31-05 3745-21-09(E)	15 lbs VOC/day. VOC content of oil shall not exceed 1.21 lbs of VOC per gallon of oil (0.16 lbs of VOC per 1.0 lb oil). See additional terms and conditions
P029	60" Slitter	Compliance with permitted limits and applicable rules. Slushing oil VOC content and usage limitations.	3745-31-05 3745-21-09(E)	20 lbs VOC/day. VOC content of oil shall not exceed 1.21 lbs of VOC per gallon of oil (0.16 lbs of VOC per 1.0 lb oil). See additional terms and conditions

<u>Ohio EPA Source Number</u>	<u>Source Identification/ Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control & Usage Requirements</u>
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P030	72" Slitter	Compliance with permitted limits and applicable rules. Slushing oil VOC content and usage limitations.	3745-31-05 3745-21-09(E)	16 lbs VOC/day. VOC content of oil shall not exceed 1.21 lbs of VOC per gallon of oil (0.16 lbs of VOC per 1.0 lb oil). See additional terms and conditions
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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	40.4