



Louisville Metro Air Pollution Control District
 850 Barret Avenue
 Louisville, Kentucky 40204-1745



Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-1553-16-F

Plant ID: 1553

Effective Date: x/xx/2016

Expiration Date: x/xx/2021

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Owner: TENARIS USA
Source: Republic Conduit Manufacturing
 7301 Logistics Dr.
 Louisville, Kentucky 40258

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

| | | |
|------------|------|-----------|
| Pollutant: | VOC | HCl (HAP) |
| Tons/year: | <100 | <10 |

| | | |
|------------------|---------------------|----------------------------------|
| Application No.: | 22917 | Application Received: 12/28/2007 |
| | 22918, 22919 | 8/7/2008, 10/29/2009 |
| | 22920, 33895, 35744 | 10/7/2010, 11/4/2011, 02/01/2012 |

Permit Writer: Yiqiu Lin

Date of Public Notice: 02/23/2016

{Manager1}
 Air Pollution Control Officer
 {date1}

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FEDOOP Permit Revisions/Changes

| Revision No. | Permit No. | Issue Date | Public Notice Date | Change Type | Change Scope | Description |
|---------------------|-------------------|-------------------|---------------------------|--------------------|---------------------|-------------------------|
| Initial | O-1553-16-F | x/xx/2016 | 2/23/2016 | Initial | Entire Permit | Initial Permit Issuance |

Construction Permit History

| Permit No. | Issue Date | Description |
|-------------------|-------------------|--|
| 13-05-C | 3/31/2006 | LEMT electro galvanizing line |
| 14-05-C | 3/31/2006 | One (1) wet scrubber #2 (9G) |
| 15-05-C | 3/31/2006 | One (1) LEMT inch mark printer (E9I) |
| 18-05-C | 3/31/2006 | Hot dip galvanizing line |
| 19-05-C | 3/31/2006 | One (1) wet scrubber #3 (11B) |
| 22-05-C | 3/31/2006 | Rigid finishing line (E13AB1 - E13C5) |
| 25-05-C | 3/31/2006 | Zinc dissolution process |
| 26-05-C | 3/31/2006 | Waste water treatment plant |
| 27-05-C | 3/31/2006 | Parts washers |
| 474-07-C | 8/31/2008 | Three (3) existing weld mills |
| 475-07-C | 8/31/2008 | One (1) baghouse, make Farr APC, model GS20. |
| 443-08-C | 6/30/2008 | 535 BHP (399 kW-hr) emergency generator |
| 526-08-C | 9/10/2008 | Mist eliminator from the passivation process |
| 587-08-C | 10/31/2008 | Three (3) storage tanks |
| 588-08-C | 10/13/2008 | Aerosol touch up coating operation |
| 589-08-C | 10/31/2008 | Weld flaw ink mark coating |
| 692-08-C | 11/30/2008 | small diameter thread line surface coating |
| 693-08-C | 11/30/2008 | Coating for large diameter thread line |
| 20-05-C(R2) | 12/8/2009 | Hot dip galvanizing line |
| 21-05-C(R1) | 10/31/2009 | Baghouse for hot dip galvanizing |
| 24-05-C(R1) | 7/31/2009 | Combustion sources |
| 28-05-C(R2) | 3/31/2009 | Storage tanks |
| 93-08-C | 1/31/2009 | Gimeco hydrochloric acid recovery unit |
| 32-09-C | 3/31/2009 | One (1) 12,750 gallon paint tank, T-2. |
| 33-09-C | 1/31/2009 | Two (2) ultra violet ink printers |
| 34-09-C | 1/31/2009 | Three (3) storage tanks |

| Permit No. | Issue Date | Description |
|--|------------|--|
| 130-09-C | 6/30/2009 | Metaullics zinc recovery (MZR) system |
| 20-10-C | 2/5/2010 | cold solvent parts washer |
| 54-10-C | 4/13/2010 | Two (2) cold solvent parts washers |
| 35226-12-C | 5/30/2012 | change to water based paint |
| The following construction permits have been voided: | | |
| 07-05-C | 3/31/2006 | Six (1) weld mills (<i>Replaced by permit 474-07-C</i>) |
| 08-05-C | 3/31/2006 | SEMT line (<i>Never installed</i>) |
| 09-05-C | 3/31/2006 | SEMT line scrubber (<i>Never installed</i>) |
| 10-05-C | 3/31/2006 | SEMT line inch mark printer (<i>Never installed</i>) |
| 11-05-C | 3/31/2006 | SEMT line ID painting (<i>Never installed</i>) |
| 12-05-C | 3/31/2006 | SEMT line thermal oxidizer (<i>Never installed</i>) |
| 23-05-C | 3/31/2009 | Three (3) baghouses (13A4, 13B3, and 13C3) controlling rigid finishing line (<i>This equipment has been removed</i>) |
| 442-08-C | 6/30/2008 | One (1) abrasive blast cleaning unit (<i>Plant maintenance equipment. It is a trivial activity</i>) |
| 444-08-C | 6/30/2008 | Small thread line end coater (<i>Replaced by 586-08-C</i>) |
| 445-08-C | 6/30/2008 | Weld flaw ink marker (<i>Replaced by 589-08-C</i>) |
| 586-08-C | 10/31/2008 | Threaded end coating (<i>Replaced by 692-08-C</i>) |
| F-13-1003-C | 10/2/2013 | Miscellaneous metal parts surface coating (<i>Never installed</i>) |

Abbreviations and Acronyms

| | |
|-------------------|---|
| AP-42 | - AP-42, <i>Compilation of Air Pollutant Emission Factors, published by U.S.EPA</i> |
| APCD | - Louisville Metro Air Pollution Control District |
| BAC | - Benchmark Ambient Concentration |
| BACT | - Best Available Control Technology |
| Btu | - British thermal unit |
| CEMS | - Continuous Emission Monitoring System |
| CFR | - Code of Federal Regulations |
| CO | - Carbon monoxide |
| District | - Louisville Metro Air Pollution Control District |
| EA | - Environmental Acceptability |
| gal | - U.S. fluid gallons |
| GHG | - Greenhouse Gas |
| HAP | - Hazardous Air Pollutant |
| HCl | - Hydrogen chloride |
| Hg | - Mercury |
| hr | - Hour |
| in. | - Inches |
| lbs | - Pounds |
| l | - Liter |
| LMAPCD | - Louisville Metro Air Pollution Control District |
| mmHg | - Millimeters of mercury column height |
| MM | - Million |
| NAICS | - North American Industry Classification System |
| NO _x | - Nitrogen oxides |
| PM | - Particulate Matter |
| PM ₁₀ | - Particulate Matter less than 10 microns |
| PM _{2.5} | - Particulate Matter less than 2.5 microns |
| ppm | - parts per million |
| PSD | - Prevention of Significant Deterioration |
| psia | - Pounds per square inch absolute |
| QA | - Quality Assurance |
| RACT | - Reasonably Available Control Technology |
| SIC | - Standard Industrial Classification |
| SIP | - State Implementation Plan |
| SO ₂ | - Sulfur dioxide |
| STAR | - Strategic Toxic Air Reduction |
| TAC | - Toxic Air Contaminant |
| UTM | - Universal Transverse Mercator |
| VOC | - Volatile Organic Compound |
| w.c. | - Water column |
| year | - Any period of twelve consecutive months, unless "calendar year" is specified |
| yr | - Year, or any 12 consecutive-month period, as determined by context |

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as

the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in Section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.

10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM₁₀, PM_{2.5}, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA; or any combination of greenhouse gasses whose combined global warming potential equals or exceeds 100,000 tons CO₂-equivalent, as defined in 40 CFR 98. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
12. Unless specified elsewhere in this permit, the owner or operator shall submit annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All annual compliance reports shall include the following per Regulation 2.17, section 3.5.
 - A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
 - The signature and title of a responsible official of the company.

The report must be postmarked no later than March 1 of the year following the calendar year covered in the annual report.

13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

| Regulation | Title |
|------------|---|
| 1.01 | General Application of Regulations and Standards |
| 1.02 | Definitions |
| 1.03 | Abbreviations and Acronyms |
| 1.04 | Performance Tests |
| 1.05 | Compliance with Emissions Standards and Maintenance Requirements |
| 1.06 | Source Self-Monitoring, Emissions Inventory Development and Reporting |
| 1.07 | Excess Emissions During Startups, Shutdowns, and Upset Conditions |
| 1.08 | Administrative Procedures |

| Regulation | Title |
|-------------------|--|
| 1.09 | Prohibition of Air Pollution |
| 1.10 | Circumvention |
| 1.11 | Control of Open Burning |
| 1.14 | Control of Fugitive Particulate Emissions |
| 2.01 | General Application (Permit Requirements) |
| 2.02 | Air Pollution Regulation Requirements and Exemptions |
| 2.03 | Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements |
| 2.07 | Public Notification for Title V, PSD, and Offset Permits; SIP Revisions; and Use of Emission Reduction Credits |
| 2.09 | Causes for Permit Modification, Revocation, or Suspension |
| 2.10 | Stack Height Considerations |
| 2.11 | Air Quality Model Usage |
| 2.17 | Federally Enforceable District Origin Operating Permits |
| 4.01 | General Provisions for Emergency Episodes |
| 4.02 | Episode Criteria |
| 4.03 | General Abatement Requirements |
| 4.07 | Episode Reporting Requirements |
| 6.01 | General Provisions |
| 6.02 | Emission Monitoring for Existing Sources |
| 7.01 | General Provisions |

14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

| Regulation | Title |
|-------------------|---|
| 1.12 | Control of Nuisances |
| 1.13 | Control of Objectionable Odors in the Ambient Air |
| 2.08 | Fees |
| 5.00 | Definitions |
| 5.01 | General Provisions |
| 5.02 | Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants |
| 5.14 | Hazardous Air Pollutants and Source Categories |
| 5.20 | Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant |
| 5.21 | Environmental Acceptability for Toxic Air Contaminants |
| 5.22 | Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant |
| 5.23 | Categories of Toxic Air Contaminants |
| 7.02 | Adoption of Federal New Source Performance Standards |

15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District
Room 205
850 Barret Ave
Louisville, KY 40204-1745***

Emission Unit: Plant-Wide Requirements**Plant-wide Applicable Regulations:**

| FEDERALLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 2.17 | Federally Enforceable District Origin Operating Permits | 1 through 9 |

| DISTRICT ONLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 5.00 | Definitions | 1, 2 |
| 5.01 | General Provisions | 1 through 2 |
| 5.20 | Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant | 1 through 5 |
| 5.21 | Environmental Acceptability for Toxic Air Contaminants | 1 through 7 |
| 5.22 | Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant | 1 through 6 |
| 5.23 | Categories of Toxic Air Contaminants | 1 through 6 |

Plant-wide Specific Conditions**S1. Standards (Regulation 2.17, section 5.1)****a. VOC**

The owner or operator shall not allow or cause total plant-wide VOC emissions to equal or exceed 100 tons during any consecutive 12-month period.¹ (Regulation 2.17, section 5.1)

b. HAP

The owner or operator shall not allow or cause plant-wide Hydrochloric Acid (HCl) emission to equal or exceed 10 tons during any 12 month consecutive period.¹ (Regulation 2.17, section 5.1)

¹ The source is potentially major for VOC and Single HAP (HCl). The source accepted less than 100 tpy for VOC and less than 10 tpy single HAP as FEDOOP limits.

c. **TAC**

- i. The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*. (Regulations 5.00 and 5.21) (See Comment 1)
- ii. The owner or operator shall submit with the notification of construction for any new emission unit the STAR EA Demonstration for all Category 1 through Category 4 TACs emitted from that emission unit.
- iii. The owner or operator shall submit a *plant-wide* emissions-based EA Demonstration to the District showing compliance with the *plant-wide* EA goals of 7.5 for new and existing, 3.8 for all new combined, and 1.0 for each TAC from each process when a change occurs that increases emissions above *de minimis* or previously modeled values.
- iv. If the TAC does not have an established BAC or *de minimis* value, the owner or operator shall calculate and report these values. The form located on the APCD website (<http://louisvilleky.gov/government/air-pollution-control-district>) may be used for determining BAC and *de minimis* values.

S2. **Monitoring and Record Keeping** (Regulation 2.17, section 5.2)

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC/ HAP**

The owner or operator shall, monthly, calculate and record the plant-wide total emissions for VOC and HCl for the previous 12-month period.

b. **TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases above *de minimis* at the time of the change.

S3. **Reporting** (Regulation 2.17, section 5.2)

The following information shall be included in the annual compliance report required by General Condition #12.

a. **VOC/ HAP**

The owner or operator shall report the plant-wide total emissions for VOC and HCl for each 12-month period.

b. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months after a change of a raw material as described in S2.b.ii.

Comments for Plant-wide Requirements

- 1. Republic Conduit submitted the TAC Environmental Acceptability Demonstration to the District in September 2008, March 2009, and July 2009. Tier 4 AERMOD air dispersion modeling was performed for each emission unit that has non-de minimis TAC emissions. Compliance with the STAR EA Goals was demonstrated in the revised EA Demonstration submitted in July, 2009. The District reviewed the EA Demonstrations submitted by the source. The following table demonstrates that the carcinogen risk and non-carcinogen risk values comply with the STAR EA goals required in Regulation 5.21.

| Plant-wide Sum | All new P/PE | | All new P/PE | |
|--|--------------|-------|--------------|-------|
| Industrial Total R _C | 5.59 | < 75 | 2.93 | < 38 |
| Non-Ind. Total R _C | 2.56 | < 7.5 | 0.90 | < 3.8 |
| Industrial Total R _{NC} (max) | 0.21 | < 3.0 | | |
| Non-Ind. Total R _{NC} (max) | 0.20 | < 1.0 | | |

| TAC | CAS # | R _{NC} Total | | | Weld Mills | | | | LEMT Line | | | | Hot Dip Galv. Line | | | | E Generator | | | | |
|------------------------------|------------|-----------------------|-----------------|-----------------|----------------|-----------------|----------------|-----------------|----------------|-----------------|----------------|-----------------|--------------------|-----------------|----------------|-----------------|----------------|-----------------|----------------|-----------------|------|
| | | Indus. | Non-Ind. | R _{NC} | Industrial | | Non-Ind. | | Industrial | | Non-Ind. | | Industrial | | Non-Ind. | | Industrial | | Non-Ind. | | |
| | | R _{NC} | R _{NC} | EA | R _C | R _{NC} | R _C | R _{NC} | R _C | R _{NC} | R _C | R _{NC} | R _C | R _{NC} | |
| Plant-wide Total Risk | | 0.21 | 0.20 | 0 | 0.54 | | 0.54 | | 1.56 | | 0.49 | | 0.55 | | 0.63 | | 2.93 | | 0.90 | | |
| Nitric acid | 7697-37-2 | 0.04 | 0.04 | <3.0/1.0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.04 | 0.00 | 0.04 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Sulfuric acid | 7664-939-9 | 0.21 | 0.20 | <3.0/1.0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.21 | 0.00 | 0.20 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Hydrochloric acid | 7647-01-0 | 0.01 | 0.01 | <3.0/1.0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Xylene | 1330-20-7 | 0.03 | 0.03 | <3.0/1.0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.03 | 0.00 | 0.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Ethyl Benzene | 100-41-4 | 0.00 | 0.00 | <3.0/1.0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.16 | 0.00 | 0.15 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Chromium+6 | 7440-47-3 | 0.02 | 0.01 | <3.0/1.0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.40 | 0.02 | 0.34 | 0.00 | 0.55 | 0.01 | 0.63 | 0.01 | 0.00 | 0.00 | 0.00 | |
| Chromium+3 | 16065-83-1 | 0.00 | 0.00 | <3.0/1.0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Lead | | 0.00 | 0.00 | <3.0/1.0 | 0.02 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Cadmium | 7440-43-9 | 0.01 | 0.01 | <3.0/1.0 | 0.52 | 0.01 | 0.52 | 0.01 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Aluminum Oxide | 7429-90-5 | 0.01 | 0.01 | <3.0/1.0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.01 | 0.00 | 0.01 | 0.00 | 0.00 | 0.00 | |
| DPM | | 0.03 | 0.00 | <3.0/1.0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 2.93 | 0.03 | 0.90 | 0.00 |

Note: Weld mills - Original application received 12/6/2004, modification application received 9/20/2006 but make/model/capacity was not changed, therefore existing equipment for STAR. LEMT line and Hot Dip – Original application received 12/6/2004, therefore existing equipment for STAR. E generator – Original application received 6/18/2008, therefore new equipment for STAR.

Emission Unit U1: Weld Mills**U1 Applicable Regulations:**

| FEDERALLY ENFORCEABLE REGULATIONS | | |
|--|--|----------------------------|
| Regulation | Title | Applicable Sections |
| 7.08 | Standards of Performance for New Process Operations | 1 through 4 |
| 7.25 | Standard of Performance for New Sources Using Volatile Organic Compounds | 1 through 5 |

| DISTRICT ONLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 5.00 | Definitions | 1, 2 |
| 5.01 | General Provisions | 1 through 2 |
| 5.14 | Hazardous Air Pollutants and Source Categories | 1, 2 |
| 5.20 | Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant | 1 through 6 |
| 5.21 | Environmental Acceptability for Toxic Air Contaminants | 1 through 5 |
| 5.22 | Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant | 1 through 5 |
| 5.23 | Categories of Toxic Air Contaminants | 1 through 6 |

U1 Equipment:^{2,3}

| Emission Point | Description | Applicable Regulation | Control ID | Stack ID | Installation Date |
|-----------------------|--|------------------------------|-------------------|-----------------|--------------------------|
| E3 | One (1) weld mill, make Thermatool, model CF14-5006460, capacity 18 ton/hr | STAR* 7.08, 7.25 | C50 | S50 | 2006 |
| E4 | One (1) weld mill, make Thermatool, model CF14-5006460, capacity 18 ton/hr | | | | |
| E5 | One (1) weld mill, make East Coast Induction, model VT-300, capacity 18 ton/hr | | | | |
| E100 | One (1) cooling tower, make Marley, model NC-8310F2, capacity 30,000 gal/day | 7.08 | N/A | S100 | 2006 |

* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.

² This unit was previously permitted by construction permit 474-07-C and 475-07-C. Each piece of equipment in this unit is an insignificant activity per PTE.

³ The weld flaw paint marking system used for weld mills is permitted under Emission Unit U6 for paint coating operations.

U1 Control Devices:

| Control ID | Description | Control Efficiency | Performance Indicator | Stack ID |
|-------------------|--|-------------------------------|------------------------------|-----------------|
| C50 | One (1) baghouse, make FARR, model GS-20 | 50% PM (July 2008 Stack Test) | N/A | S50 |

U1 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. PM

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr per piece of equipment (E3, E4, E5, and E100) based on actual operating hours in a calendar day.⁴ (Regulation 7.08, section 3.1.2)

b. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

c. VOC

i. The owner or operator shall not allow VOC emissions from all the weld mills to exceed 6.44 tons during any consecutive 12-month period.⁵ (Regulation 7.25, section 3.1)

ii. See Plant-wide Requirements S1.a.

d. TAC

See Plant-wide Requirements S1.c.⁶

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. PM

There are no routine monitoring and record keeping requirements for PM.

⁴ It has been demonstrated that the PM emissions from each weld mill and the cooling tower cannot exceed the lb/hr PM emission standard uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission standard.

⁵ This unit is subject to Regulation 7.25 because of VOC emissions from weld mill coolant. On January 6, 2014, Republic Conduit submitted a BACT analysis based on a PTE of 6.44 tpy VOC in accordance with the application. The District approves the BACT Analysis through issuance of this FEDOOP permit.

⁶ TAC emissions from insignificant activities of this unit are de minimis per Regulation 5.21, section 2.3.

b. Opacity

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. VOC

- i. The owner or operator shall, monthly, calculate and record monthly and the previous 12-month period total VOC emissions for all the weld mills.
- ii. See Plant-wide Requirement S2.a.

d. TAC

See Plant-wide Requirements S2.b.

S3. Reporting (Regulation 2.17, section 5.2)**a. PM**

There are no routine reporting requirements for PM.

b. Opacity

The owner or operator shall identify all periods of exceeding an opacity standard during a reporting period. The report shall include the following:

- i. Any deviation from the requirement to perform monthly visible emission surveys or Method 9 tests;
 - ii. Any deviation from the requirement to record the results of each VE survey and Method 9 test performed;
 - iii. The date and time of each VE Survey where visible emissions were observed and the results of any Method 9 test performed;
 - iv. The date, time and results of follow-up VE survey;
 - v. The date, time, and results of any Method 9 test performed;
 - vi. Identification of all periods of exceeding an opacity standard; and
 - vii. If no deviations occur during a quarterly reporting period, the report shall contain a negative declaration.
- c. **VOC**
- i. The owner or operator shall report the monthly and consecutive 12 month total VOC emissions from all the weld mills.
 - ii. See Plant-wide Requirement S3.a.
- d. **TAC**
- See Plant-wide Requirements S3.b.

Emission Unit U2: LEMT Electro Galvanizing Line**U2 Applicable Regulations:**

| FEDERALLY ENFORCEABLE REGULATIONS | | |
|--|--|----------------------------|
| Regulation | Title | Applicable Sections |
| 7.08 | Standards of Performance for New Process Operations | 1 through 4 |
| 7.25 | Standard of Performance for New Sources Using Volatile Organic Compounds | 1 through 5 |
| 40 CFR 63 Subpart WWWW | National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations | 63.11504 through 63.11513 |

| DISTRICT ONLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 5.00 | Definitions | 1, 2 |
| 5.01 | General Provisions | 1 through 2 |
| 5.02 | Adoption of National Emission Standards for Hazardous Air Pollutants | 1 and 4 |
| 5.14 | Hazardous Air Pollutants and Source Categories | 1, 2 |
| 5.20 | Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant | 1 through 6 |
| 5.21 | Environmental Acceptability for Toxic Air Contaminants | 1 through 5 |
| 5.22 | Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant | 1 through 5 |
| 5.23 | Categories of Toxic Air Contaminants | 1 through 6 |

U2 Equipment:^{7,8}

| Emission Point | Description | Make/Model | Applicable Regulation | Control ID | Stack ID | Installation Date |
|-----------------------|---------------------------------------|----------------------------|------------------------------|-------------------|-----------------|--------------------------|
| E7 | Descale #1 heater and tank, 30 ton/hr | Six Inch Maxon/Tub-o-therm | STAR*, 7.08, 40CFR63, WWWW | C21 | S21 | 2006 |
| E8 | Descale #2 heater and tank, 30 ton/hr | Six Inch Maxon/Tub-o-therm | | C21 | S21 | 2006 |
| E9 | Descale #3 heater and tank, 30 ton/hr | Six Inch Maxon/Tub-o-therm | | C21 | S21 | 2006 |

⁷ This unit was previously permitted by construction permits 13-05-C, 14-05-C, 15-05-C, 33-09-C, 25-05-C, and 130-09-C.

⁸ The LEMT ID paint and drying oven is permitted under Emission Unit U6 for paint coating operations.

| Emission Point | Description | Make/Model | Applicable Regulation | Control ID | Stack ID | Installation Date |
|----------------|--|--------------------------------|------------------------------------|------------|----------|-------------------|
| E10 | Electroclean #1 heater and tank, 30 ton/hr | Six Inch Maxon/ Tub-o-therm | STAR*, 7.08, 40CFR63, WWWWWW | C21 | S21 | 2006 |
| E11 | Electroclean #2 heater and tank, 30 ton/hr | Six Inch Maxon/ Tub-o-therm | | C21 | S21 | 2006 |
| E12a | One (1) drying oven | Automated Solutions | | C21 | S21 | 2006 |
| E12b | One (1) tube cooling | Automated Solutions | | C21 | S21 | 2006 |
| E18 | One (1) zinc dissolver (T-32), 5,300 gallon | Custom | | C21 | S21 | 2006 |
| E21 | Rinse, pickle, plating, and post plating bath tanks, 30 ton/hr | Custom | | C21 | S21 | 2006 |
| E24 | One (1) Sodium sulfate hopper | Custom | 7.08 | N/A | N/A | 2006 |
| E30a | One (1) LEMT Inch mark printer | Print Safe/ Alpha Jet | STAR*, 7.25 | N/A | N/A | 2006 |
| E30b | Two (2) LEMT UV ink printers | Promark/PM- 4100 & 4200 | STAR*, 7.25 | N/A | N/A | 2009 |

* STAR rules consist of Regulation 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.

U2 Control Devices:

| Control ID | Description | Control Efficiency | Performance Indicator | Stack ID |
|------------|--|--------------------------------|---------------------------|----------|
| C21 | One (1) wet scrubber, make Heil, model 7610-SP, 10,000 CFM. (2006) | 83% PM (April 2010 Stack Test) | Monthly visual inspection | S21 |

U2 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. PM

- i. The owner or operator shall not allow PM emissions to exceed 17.18 lb/hr from the LEMT galvanizing line (E7 – E21 combined) based on actual operating hours in a calendar day.⁹ (Regulation 7.08, section 3.1.2)
- ii. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr from the sodium sulfate hopper (E24) based on actual operating hours in a calendar day.⁹ (Regulation 7.08, section 3.1.2)

b. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

c. VOC

- i. The owner or operator shall not allow or cause plantwide VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25, including LEMT Ink Mark Printer (U2-E30a) and LEMT UV Printers (U2-E30b), to equal or exceed 5 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District.^{10,11} (Regulation 7.25, section 2.1 and 3.1)
- ii. See Plant-wide Requirements S1.a.

d. HAP (40 CFR 63, Subpart WWWWWW)

The owner or operator shall comply with all emission limitations, work practice standards, and operating limits in 40 CFR 63, Subpart WWWWWW (See Attachment A).

⁹ It has been demonstrated that the PM emissions from the LEMT galvanizing line and sodium sulfate hopper cannot exceed the lb/hr PM emission standard uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission standard.

¹⁰ On January 6, 2014, Republic Conduit submitted a BACT analysis for weld mills coolant and thread line coolant and the District approved this BACT analysis. Therefore VOC emissions from weld mill coolant and thread line coolant are not subject to this plant-wide 5 tpy limit per Regulation 7.25.

¹¹ It has been demonstrated that the total potential VOC emissions from LEMT Ink Mark Printer (U2-E30a) and LEMT UV Printers (U2-E30b) cannot exceed 5 tpy uncontrolled. Therefore they are in compliance with Regulation 7.25 and a BACT analysis is not required.

e. **TAC**

- i. The owner or operator shall not allow Sulfuric Acid (H₂SO₄) from the LEMT galvanizing line to exceed 604 lbs/consecutive 12-month period.¹² (Regulation 5.21, section 4.2 and section 4.3)
- ii. The owner or operator shall operate and maintain the web scrubber C21 at all times when the LEMT galvanizing line is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice to meet the standards.¹³ (Regulation 5.21, section 4.2 and section 4.3)
- iii. See Plant-wide Requirements S1.c.

S2. **Monitoring and Record Keeping** (Regulation 2.17, section 5.2)

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. **PM**

There are no routine monitoring and record keeping requirements for PM.

b. **Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible

¹² The LEMT galvanizing line has sulfuric acid emission standards since its EA Demonstration was based on controlled PTE. AERMOD modeling results and controlled PTE for sulfuric acid were used to demonstrate compliance with EA Goals.

¹³ The sulfuric acid emission limit is based on controlled PTE calculated using emission factors from 4/3/2012 stack test. It has been demonstrated that the uncontrolled sulfuric acid emissions from the LEMT line cannot meet the EA goals specified in Regulation 5.21. Therefore, the owner or operator is required to operate the wet scrubber to meet the TAC standards.

emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **VOC**

- i. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. for the LEMT Ink Mark Printer (U2-E30a) and LEMT UV Printers (U2-E30b).
- ii. The owner or operator shall, monthly, calculate and record the monthly and the previous 12-month period total VOC emissions for the LEMT Ink Mark Printer (U2-E30a) and LEMT UV Printers (U2-E30b).
- iii. See Plant-wide Requirement S2.a.

d. **HAP** (40 CFR 63, Subpart WWWWWW)

The owner or operator shall comply with all monitoring and record keeping requirements in 40 CFR 63, Subpart WWWWWW (See Attachment A).

e. **TAC**

- i. The owner or operator shall monthly calculate and record Sulfuric Acid (H_2SO_4) emissions from the LEMT galvanizing line.
- ii. If there is any time that the wet scrubber (C21) is bypassed or not in operation when the LEMT galvanizing line is in operation, then the owner or operator shall keep a record of the following for each bypass event:
 - 1) Date;
 - 2) Start time and stop time;
 - 3) Identification of the control device and process equipment;
 - 4) H_2SO_4 emissions during the bypass in lb/consecutive 12-month period;
 - 5) Summary of the cause or reason for each bypass event;
 - 6) Corrective action taken to minimize the extent or duration of the bypass event; and
 - 7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.
- iii. See Plant-wide Requirements S2.b.

S3. **Reporting** (Regulation 2.17, section 5.2)

a. **PM**

There are no routine reporting requirements for PM.

b. **Opacity**

The owner or operator shall identify all periods of exceeding an opacity standard during a reporting period. The report shall include the following:

- i. Any deviation from the requirement to perform monthly visible emission surveys or Method 9 tests;
- ii. Any deviation from the requirement to record the results of each VE survey and Method 9 test performed;
- iii. The date and time of each VE Survey where visible emissions were observed and the results of any Method 9 test performed;
- iv. The date, time and results of follow-up VE survey;
- v. The date, time, and results of any Method 9 test performed;
- vi. Identification of all periods of exceeding an opacity standard; and
- vii. If no deviations occur during a quarterly reporting period, the report shall contain a negative declaration.

c. **VOC**

- i. There are no reporting requirements for VOC standard per Regulation 7.25.¹⁴
- ii. See Plant-wide Requirement S3.a.

d. **HAP** (40 CFR 63, Subpart WWWWWW)

The owner or operator shall comply with all reporting requirements in 40 CFR 63, Subpart WWWWWW (See Attachment A).

e. **TAC**

- i. The owner or operator shall report the following information regarding bypass activity in the annual compliance reports.
 - 1) Number of times the vent stream bypasses the wet scrubber (C21) and is vented to the atmosphere when the LEMT galvanizing line is in operation;
 - 2) Duration of each bypass to the atmosphere;

¹⁴ It has been demonstrated that the total potential VOC emissions from LEMT Ink Mark Printer (U2-E30a) and LEMT UV Printers (U2-E30b) cannot exceed 5 tpy uncontrolled.

- 3) Calculated H_2SO_4 emissions, in lb/consecutive 12-month period, for each bypass and identification of any exceedance of the TAC standards; or
 - 4) A negative declaration if no bypasses occurred.
- ii. See Plant-wide Requirements S3.b.

Emission Unit U3: Hot Dip Galvanizing Line**U3 Applicable Regulations:**

| FEDERALLY ENFORCEABLE REGULATIONS | | |
|--|--|----------------------------|
| Regulation | Title | Applicable Sections |
| 7.08 | Standards of Performance for New Process Operations | 1 through 4 |
| 40 CFR 63 Subpart WWWW | National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations | 63.11504 through 63.11513 |

| DISTRICT ONLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 5.00 | Definitions | 1, 2 |
| 5.01 | General Provisions | 1 through 2 |
| 5.02 | Adoption of National Emission Standards for Hazardous Air Pollutants | 1 and 4 |
| 5.14 | Hazardous Air Pollutants and Source Categories | 1, 2 |
| 5.20 | Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant | 1 through 6 |
| 5.21 | Environmental Acceptability for Toxic Air Contaminants | 1 through 5 |
| 5.22 | Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant | 1 through 5 |
| 5.23 | Categories of Toxic Air Contaminants | 1 through 6 |

U3 Equipment:¹⁵

| Emission Point | Description | Make/Model | Applicable Regulation | Control ID | Stack ID | Installation Date |
|-----------------------|---|-------------------|------------------------------|-------------------|-----------------|--------------------------|
| E23 | Cleaning and pickling tanks and one (1) HCl acid recovery unit, 43.8 ton/hr | Gimeco/ Custom | STAR*,7.08 | C23 | S23 | 2006 |

¹⁵ This unit was previously permitted by construction permits 18-05-C, 19-05-C, 20-05-C(R2), 21-05-C, 93-08-C, and 526-08-C.

| Emission Point | Description | Make/Model | Applicable Regulation | Control ID | Stack ID | Installation Date |
|----------------|---|---|------------------------------------|--------------|----------|-------------------------|
| E25 | One (1) preheater, one (1) zinc kettle, one (1) hot dip blow out, and two (2) process cyclones, 43.8 ton/hr | Gimeco/ Custom | STAR*,7.08 | C25, C25A | S25 | 2006 |
| E28 | One (1) water quench, one (1) passivation spray, and one (1) water rinse tank, 43.8 ton/hr | Gimeco/ Custom (Passivation - Harrington/ Custom) | STAR*,7.08, 40CFR63 Subpart WWWWWW | | | 2006 (Passivation 2008) |
| E29 | Drying oven, 43.8 ton/hr | Gimeco/ Custom | STAR*,7.08 | N/A | S29 | 2006 |

* STAR rules consist of Regulations 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.

U3 Control Devices:

| Control ID | Description | Control Efficiency | Performance Indicator | Stack ID |
|------------|---|---------------------------------|---|----------|
| C23 | One (1) wet scrubber, make and model Unk (2006) | 96% HCl (April 2010 Stack Test) | Monthly visual inspection | S23 |
| C25 | One (1) baghouse, make Eurofilter, model CDF 60/20 (2006) | 98% PM (April 2010 Stack Test) | 0.9 - 3.5 inches water column | S25 |
| C25A | One (1) mist eliminator (2008) | 80% (District pre-approved) | 0.1 – 6.0 inches water column ¹⁶ | S25 |

¹⁶ Republic Conduit established this pressure drop range under normal operation per construction permit 526-08-C and submitted to the District on 1/5/2012.

U3 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. PM

- i. The owner or operator shall not allow PM emissions to exceed 26.41 lb/hr from cleaning and pickling (E23) based on actual operating hours in a calendar day.¹⁷ (Regulation 7.08, section 3.1.2) (Construction permit 18-05-C)
- ii. The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr from hot dip line (E25, E28, and E29 combined) based on actual operating hours in a calendar day.¹⁸ (Regulation 7.08, section 3.1.2) (Construction permit 20-05-C (R2))
- iii. The owner or operator shall limit the production rate of the hot dip galvanizing line to less than 87,516 lbs/hr, unless the District approves a subsequence stack test that indicates a different production rate.¹⁹
- iv. The owner or operator shall operate and maintain the baghouse (C25) at all times when the hot dip galvanizing line is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice to meet the standards. (Regulation 7.08, section 3.2.1)

b. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

c. HAP

- i. See Plant-wide Requirements S1.b.

¹⁷ It has been demonstrated that the PM emissions from the cleaning and pickling tanks (E23) cannot exceed the lb/hr PM emission standard uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission standard.

¹⁸ It has been demonstrated that the PM emissions from the hot dip galvanizing line E25 can exceed the lb/hr PM emission standard uncontrolled, but cannot exceed the PM standard controlled. Therefore, the source is required to operate baghouse (C25) at all time in order to comply with the lb/hr PM emission standard.

¹⁹ In an email dated 12/7/2009, Republic Conduit requested an 87,516 lbs/hr throughput limit to meet the throughput requirements for the stack test. If Republic Conduit requests to increase the production limit, the stack test needs to be redone at more than 90% of the new limit.

- ii. The owner or operator shall comply with all emission limitations, work practice standards, and operating limits in 40 CFR 63, Subpart WWWW (See Attachment A).

d. TAC

- i. The owner or operator shall not allow TAC emissions for the cleaning and pickling tanks (E23) and passivation (E28) to exceed the TAC emission standards listed in the following table.²⁰ (Regulation 5.21, section 4.2 and section 4.3)

| Emission Point | TAC Name | CAS # | TAC Limits Determination | |
|----------------|-------------------|------------|---------------------------------|-----------------|
| | | | | Basis of Limits |
| E23 | Hydrochloric acid | 7647-01-0 | De minimis values ²¹ | De Minimis |
| E28 | Chromium III | 16065-83-1 | | De Minimis |
| E28 | Chromium VI | 7440-47-3 | 4.05 lbs/12-monthe | Controlled PTE |

- ii. The owner or operator shall operate and maintain the web scrubber (C23) and mist eliminator (C25A) at all times when the hot dip galvanizing line is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice to meet the standards.²² (Regulation 5.21, section 4.2 and section 4.3)
- iii. See Plant-wide Requirements S1.c.

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. PM

- i. The owner or operator shall maintain the daily records of the hourly average production rate, in lbs/hr for each day.

²⁰ This unit has TAC emission standards since its EA Demonstration was based on controlled PTE. If the controlled PTE for the TAC is less than de minimis level, use De Minimis as limit. If the controlled PTE for the TAC is greater than de minimis level, modeling results were used to calculate risk value to compare to the EA Goals and controlled PTE is used as limit.

²¹ The TAC emission limits determined by de minimis values shall be updated each time when the District revises the BAC/de minimis values for these TACs. The current de minimis values per TAC list revised on 10/14/2013: HCl (10.6 lb/hr, 9,600 lb/yr), Cr (III) (0.1 lb/hr, 109.5 lb/yr).

²² It has been demonstrated that the uncontrolled potential TAC emissions from the hot dip galvanizing line cannot meet the EA goals specified in Regulation 5.21. Therefore, the owner or operator is required to operate the wet scrubber and mist eliminator to meet the TAC standards.

- ii. The owner or operator shall maintain monthly records of the type and amount of products transferred.
- iii. The owner or operator shall, monthly, perform a visual inspection of the structural and mechanical integrity of the control devices C23, C25, and C25A for signs of damage, air leakage, corrosion, etc. and repair and/or replace defective components within 7 days after the equipment defect was first observed.
- iv. The owner or operator shall maintain monthly records of the results of each visual inspection. The records shall include the date of the inspection, the name of the person who performed the inspection, identification and description of any equipment defects observed, and the date of repair or replacement of defective components.
- v. The owner or operator shall monitor and record the pressure drop across baghouses C25 at least once per day. The normal pressure drop range is 0.9 to 3.5 inches water column. The owner or operator shall take corrective action if the pressure drop across the baghouse is out of normal range.
- vi. The owner or operator shall maintain daily records of any periods of time where the hot dip galvanizing line was operating and the baghouse C25 was not operating or a declaration that the baghouse was operated at all times that day when the hot dip galvanizing line was operating.
- vii. If there is any time that the baghouse C25 is bypassed or not in operation when the hot dip galvanizing line is operating, then the owner or operator shall keep a record of the following for each bypass event:
 - 1) Date;
 - 2) Start time and stop time;
 - 3) Identification of the control device and process equipment;
 - 4) The PM emission, in lb/hr, based on actual operating hours in a calendar day;
 - 5) Summary of the cause or reason for each bypass event;
 - 6) Corrective action taken to minimize the extent or duration of the bypass event; and
 - 7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

b. Opacity

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No

more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **HAP**

- i. See Plant-wide Requirements S2.a.
- ii. The owner or operator shall, monthly, calculate and record monthly and the previous 12-month period total HCl emissions for the hot dip galvanizing line.
- iii. The owner or operator shall comply with all monitoring and record keeping requirements in 40 CFR 63, Subpart WWWW (See Attachment A).

d. **TAC**

- i. The owner or operator shall monthly calculate and record TAC emissions (HCl, Cr(III), Cr(VI)) from the cleaning and pickling tanks (E23) and passivation (E28).
- ii. The owner or operator shall monitor and record the pressure drop across mist eliminator (C25A) at least once per day. The normal pressure drop range is 0.1 to 6.0 inches water column. The owner or operator shall take corrective action if the pressure drop across the baghouse is out of normal range.
- iii. The owner or operator shall maintain daily records of any periods of time where the hot dip galvanizing line was operating and the wet scrubber (C23) or mist eliminator (C25A) was not operating or a declaration that

the control devices were operated at all times that day when the hot dip galvanizing line was operating.

- iv. If there is any time that the wet scrubber (C23) and mist eliminator (C25A) are bypassed or not in operation when the hot dip galvanizing line is in operation, then the owner or operator shall keep a record of the following for each bypass event:
 - 1) Date;
 - 2) Start time and stop time;
 - 3) Identification of the control device and process equipment;
 - 4) TAC emissions during the bypass, in lb/hr (for HCl and Cr(III)) and lb/12 consecutive month period (for HCl, Cr(III), and Cr(VI));
 - 5) Summary of the cause or reason for each bypass event;
 - 6) Corrective action taken to minimize the extent or duration of the bypass event; and
 - 7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.
- v. See Plant-wide Requirements S2.b.

S3. Reporting (Regulation 2.17, section 5.2)

a. PM

- i. For control devices C23, C25, and C25A, the number and type of repairs made and/or replacement of equipment components during the reporting period and a description of any corrective action taken. If no actions are taken during an annual reporting period, the report shall contain a negative declaration. The owner or operator shall report any deviation from the requirement to perform visual inspections of the structural and mechanical integrity of the control devices C23, C25, and C25A.
- ii. The owner or operator shall identify all periods of the pressure drop across the baghouse C25 outside the normal range and any corrective action taken for each exceedance.
- iii. The owner or operator shall report the following information regarding PM Bypass Activity in the annual compliance reports.
 - 1) Number of times the PM vent stream bypasses baghouses C25 and is vented to the atmosphere when the hot dip galvanizing line was operating;
 - 2) Duration of each bypass to the atmosphere;
 - 3) Calculated PM emissions, in lb/hr for each bypass and identification of any exceedance of the PM standards; or

- 4) A negative declaration if no bypasses occurred.

b. Opacity

The owner or operator shall identify all periods of exceeding an opacity standard during a reporting period. The report shall include the following:

- i. Any deviation from the requirement to perform monthly visible emission surveys or Method 9 tests;
- ii. Any deviation from the requirement to record the results of each VE survey and Method 9 test performed;
- iii. The date and time of each VE Survey where visible emissions were observed and the results of any Method 9 test performed;
- iv. The date, time and results of follow-up VE survey;
- v. The date, time, and results of any Method 9 test performed;
- vi. Identification of all periods of exceeding an opacity standard; and
- vii. If no deviations occur during a quarterly reporting period, the report shall contain a negative declaration.

c. HAP

- i. See Plant-wide Requirements S3.a.
- ii. The owner or operator shall comply with all reporting requirements in 40 CFR 63, Subpart WWWW (See Attachment A).

d. TAC

- i. The owner or operator shall identify all periods of the pressure drop across the mist eliminator (C25A) outside the normal range and any corrective action taken for each exceedance.
- ii. The owner or operator shall report the following information regarding bypass activity in the annual compliance reports.
 - 1) Number of times the vent stream bypasses the wet scrubber (C23) or mist eliminator (C25A) and is vented to the atmosphere when the hot dip galvanizing line is in operation;
 - 2) Duration of each bypass to the atmosphere;
 - 3) Calculated TAC emissions, in lb/hr (for HCl and Cr(III)) and lb/12 consecutive month period (for HCl, Cr(III), and Cr(VI)), for each bypass and identification of any exceedance of the TAC standards; or
 - 4) A negative declaration if no bypasses occurred.
- iii. See Plant-wide Requirements S3.b.

Emission Unit U4: Thread Line**U4 Applicable Regulations:**

| FEDERALLY ENFORCEABLE REGULATIONS | | |
|--|--|----------------------------|
| Regulation | Title | Applicable Sections |
| 7.08 | Standards of Performance for New Process Operations | 1 through 4 |
| 7.25 | Standard of Performance for New Sources Using Volatile Organic Compounds | 1 through 5 |

| DISTRICT ONLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 5.00 | Definitions | 1, 2 |
| 5.01 | General Provisions | 1 through 2 |
| 5.14 | Hazardous Air Pollutants and Source Categories | 1, 2 |
| 5.20 | Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant | 1 through 6 |
| 5.21 | Environmental Acceptability for Toxic Air Contaminants | 1 through 5 |
| 5.22 | Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant | 1 through 5 |
| 5.23 | Categories of Toxic Air Contaminants | 1 through 6 |

U4 Equipment:^{23,24}

| Emission Point | Description | Make/Model | Applicable Regulation | Control ID | Stack ID | Installation Date |
|-----------------------|-------------------------|-------------------|------------------------------|-------------------|-----------------|--------------------------|
| E13-AB1 | Saw, 30 ton/hr | N/A | STAR*,7.08, 7.25 | N/A | N/A | 2006 |
| E13-A2 | Facing, 15 ton/hr | N/A | | N/A | N/A | 2006 |
| E13-A3 | Threading, 15 ton/hr | N/A | | N/A | N/A | 2006 |
| E13-A5 | Cap/Coupling, 15 ton/hr | N/A | | N/A | N/A | 2006 |
| E13-A6 | Bundling, 15 ton/hr | N/A | | N/A | N/A | 2006 |
| E13-B1 | Facing, 15 ton/hr | N/A | | N/A | N/A | 2006 |
| E13-B2 | Threading, 15 ton/hr | N/A | | N/A | N/A | 2006 |

²³ Each piece of equipment in this unit is an insignificant activity per PTE, except for the threaded end coating (E13-A7, E13-B6, and E13-C6). This unit was previously permitted by construction permit 22-05-C. Republic Conduit has informed the District that the three metalizing process and their associated baghouses are no longer in operation; the 20' conduit threading machine and end coating will not be installed. Therefore permit 23-05-C and F-13-1003-C are not incorporated into this operating permit.

²⁴ The threaded ends coating operations are permitted under Emission Unit U6 for paint coating operations.

| Emission Point | Description | Make/Model | Applicable Regulation | Control ID | Stack ID | Installation Date |
|--|-------------------------|-------------------|------------------------------|-------------------|-----------------|--------------------------|
| E13-B4 | Cap/Coupling, 15 ton/hr | N/A | STAR*,7.08, 7.25 | N/A | N/A | 2006 |
| E13-B5 | Bundling, 15 ton/hr | N/A | | N/A | N/A | 2006 |
| E13-C1 | Facing, 15 ton/hr | N/A | | N/A | N/A | 2006 |
| E13-C2 | Threading, 15 ton/hr | N/A | | N/A | N/A | 2006 |
| E13-C4 | Cap/Coupling, 15 ton/hr | N/A | | N/A | N/A | 2006 |
| E13-C5 | Bundling, 15 ton/hr | N/A | | N/A | N/A | 2006 |
| * STAR rules consist of Regulation 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23. | | | | | | |

U4 Control Devices:

There are no control devices associated with this unit.

U4 Specific Conditions

S1. **Standards** (Regulation 2.17, section 5.1)

a. **PM**

- i. The owner or operator shall not allow PM emissions to exceed 29.54 lb/hr from each of the saws (E13-AB1) based on actual operating hours in a calendar day.²⁵ (Regulation 7.08, section 3.1.2) (Construction permit 22-05-C)
- ii. The owner or operator shall not allow PM emissions to exceed 19.24 lb/hr from each of the facing (E13-A2, E13-B1, E13-C1), threading ((E13-A3, E13-B2, E13-C2), cap/coupling ((E13-A5, E13-B4, E13-C4), and bundling ((E13-A6, E13-B5, E13-C5) based on actual operating hours in a calendar day.²⁵ (Regulation 7.08, section 3.1.2) (Construction permit 22-05-C)

b. **Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

c. **VOC**

- i. The owner or operator shall not allow VOC emissions from the coolant used in thread lines to exceed 1.03 tons during any consecutive 12-month period.²⁶ (Regulation 7.25, section 3.1)
- ii. See Plant-wide Requirements S1.a.

d. **TAC**

See Plant-wide Requirements S1.c.²⁷

S2. **Monitoring and Record Keeping** (Regulation 2.17, section 5.2)

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

²⁵ It has been demonstrated that the PM emissions from each piece of equipment cannot exceed the lb/hr PM emission standard uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission standard.

²⁶ This unit is subject to Regulation 7.25 because of VOC emissions from thread lines coolant. On January 6, 2014, Republic Conduit submitted a BACT analysis based on a PTE of 1.03 tpy VOC in accordance with the application. The District approves the BACT Analysis through issuance of this FEDOOP permit.

²⁷ TAC emissions from insignificant activities of this unit are de minimis per Regulation 5.21, section 2.3.

a. **PM**

There are no routine monitoring and record keeping requirements for PM.

b. **Opacity**

- i. The owner or operator shall conduct a monthly one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

c. **VOC**

- i. The owner or operator shall, monthly, calculate and record monthly and the previous 12-month period total VOC emissions for all the thread lines.
- ii. See Plant-wide Requirement S2.a.

d. **TAC**

See Plant-wide Requirements S2.b.

S3. **Reporting** (Regulation 2.17, section 5.2)

a. **PM**

There are no routine reporting requirements for PM.

b. Opacity

The owner or operator shall identify all periods of exceeding an opacity standard during a reporting period. The report shall include the following:

- i. Any deviation from the requirement to perform monthly visible emission surveys or Method 9 tests;
- ii. Any deviation from the requirement to record the results of each VE survey and Method 9 test performed;
- iii. The date and time of each VE Survey where visible emissions were observed and the results of any Method 9 test performed;
- iv. The date, time and results of follow-up VE survey;
- v. The date, time, and results of any Method 9 test performed;
- vi. Identification of all periods of exceeding an opacity standard; and
- vii. If no deviations occur during a quarterly reporting period, the report shall contain a negative declaration.

c. VOC

- i. The owner or operator shall report the monthly and consecutive 12 month total VOC emissions from all the weld mills.
- ii. See Plant-wide Requirement S3.a.

d. TAC

See Plant-wide Requirements S3.b.

Emission Unit U5: Natural gas-fired boilers and heaters**U5 Applicable Regulations:**

| FEDERALLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 7.06 | Standards of Performance for New Indirect Heat Exchangers | 1 through 8 |
| 7.08 | Standards of Performance for New Process Operations | 1 through 4 |

| DISTRICT ONLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 5.00 | Definitions | 1, 2 |
| 5.01 | General Provisions | 1 through 2 |
| 5.14 | Hazardous Air Pollutants and Source Categories | 1, 2 |
| 5.20 | Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant | 1 through 6 |
| 5.21 | Environmental Acceptability for Toxic Air Contaminants | 1 through 5 |
| 5.22 | Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant | 1 through 5 |
| 5.23 | Categories of Toxic Air Contaminants | 1 through 6 |

U5 Equipment:²⁸

| Emission Point | Description | Applicable Regulation | Control ID | Stack ID | Installation Date |
|-----------------------|--|------------------------------|-------------------|-----------------|--------------------------|
| E14-A | Natural gas-fired boilers, including (2) 9.5 MMBTU/hr boilers, (1) 8.0 MMBTU/hr boiler | STAR*,7.06 | N/A | N/A | Various |

²⁸ Each boiler or heater in this unit is an insignificant activity per PTE, except for the 16.8 MMBtu/hr hot dip preheater. This unit was previously permitted by construction permit 24-05-C (R1).

| Emission Point | Description | Applicable Regulation | Control ID | Stack ID | Installation Date |
|--|---|-----------------------|------------|----------|-------------------|
| E14-B | Natural gas-fired process heaters or ovens, including: (1) 1.21 MMBTU/hr hot dip superheater; (1) 16.8 MMBTU/hr hot dip preheater; (1) 2.5 MMBTU/hr zinc kettle heater; (6) building heaters 9.3 MMBTU/hr total; (3) building intake heaters 10.584 MMBtu/hr total; (5) 2 MMBtu/hr E-galv. process heaters; (1) 1.4 MMBTU/hr hot dip drying oven; (1) 0.1 MMBtu/hr zinc recovery heater; (2) 0.015 MMBtu/hr small dia. end heaters; (1) 3.2 MMBtu/hr thermal oxidizer; (1) 3.2 MMBtu/hr LEMT flow coating heater | STAR*,7.08 | N/A | N/A | Various |
| * STAR rules consist of Regulation 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23. | | | | | |

U5 Control Devices:

There are no control devices associated with this unit.

U5 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. PM

- i. The owner or operator shall not cause to be discharged into the atmosphere from the boilers (E14-A) particulate matter in excess of 0.33 lb/MMBtu actual total heat input.²⁹ (Regulation 7.06, section 4.1.4)
- ii. The owner or operator shall not allow PM emissions from each of the process heaters or ovens (E14-B) to exceed 2.34 lb/hr based on actual operating hours in a calendar day.²⁹ (Regulation 7.08, section 3.1.2)

b. Opacity

The owner or operator shall not cause to be discharged into the atmosphere from any affected facility particulate matter emissions which exhibit greater than 20% opacity.³⁰ (Regulation 7.06, section 4.2 and Regulation 7.08, section 3.2)

c. SO₂

The owner or operator shall not cause to be discharged into the atmosphere from the boilers (E14-A) any gases which contain SO₂ in excess of 1.0 lb/MMBtu actual total heat input for combustion of gaseous fuels.²⁹ (Regulation 7.06, section 5.1.1)

d. VOC

See Plant-wide Requirements S1.a.

e. NO_x

The owner or operator shall not cause to be discharged into the atmosphere from any process heaters or ovens (E14-B) any NO_x fumes in excess of 300 ppm by volume expressed as NO₂.²⁹ (Regulation 7.08, section 4)

²⁹ The District has performed a one-time PM, NO_x and SO₂ compliance demonstration for the boilers, process heaters and oven using AP-42 emission factors and combusting natural gas and propane, the regulatory emission standards cannot be exceeded. Therefore, there are no monitoring, record keeping, and reporting requirements for these boilers, process heaters and oven with respect to PM, NO_x and SO₂ emission limits.

³⁰ The District has determined that the opacity standard will be met through the exclusive use of natural gas and propane. Therefore, the company is not required to perform periodic monitoring to demonstrate compliance with the opacity standard.

f. **TAC**

See Plant-wide Requirements S1.c.³¹

S2. **Monitoring and Record Keeping (Regulation 2.17, section 5.2)**

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. **PM**

There are no monitoring or record keeping requirements for PM.

b. **Opacity**

There are no monitoring or record keeping requirements for Opacity.

c. **SO₂**

There are no monitoring or record keeping requirements for SO₂.

d. **VOC**

i. The owner or operator shall, monthly, calculate and record monthly and the previous 12-month period total VOC emissions for this unit.

ii. See Plant-wide Requirement S2.a.

e. **NO_x**

There are no monitoring or record keeping requirements for NO_x.

f. **TAC**

See Plant-wide Requirements S2.b.

S3. **Reporting (Regulation 2.17, section 5.2)**a. **PM**

There are no routine reporting requirements for PM.

³¹ TAC emissions from the combustion of natural gas or propane are de minimis per Regulation 5.21, section 2.7.

b. **Opacity**

There are no routine reporting requirements for Opacity.

c. **SO₂**

There are no routine reporting requirements for SO₂.

d. **VOC**

See Plant-wide Requirement S3.a.

e. **NO_x**

There are no monitoring or record keeping requirements for NO_x.

f. **TAC**

See Plant-wide Requirements S3.b.

Emission Unit U6: Paint Coating Operations**U6 Applicable Regulations:**

| FEDERALLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 7.08 | Standards of Performance for New Process Operations | 1 through 4 |
| 7.59 | Standard of Performance for New Miscellaneous Metal Parts and Products Surface Coating Operations | 1 through 7 |

| DISTRICT ONLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 5.00 | Definitions | 1, 2 |
| 5.01 | General Provisions | 1 through 2 |
| 5.14 | Hazardous Air Pollutants and Source Categories | 1, 2 |
| 5.20 | Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant | 1 through 6 |
| 5.21 | Environmental Acceptability for Toxic Air Contaminants | 1 through 5 |
| 5.22 | Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant | 1 through 5 |
| 5.23 | Categories of Toxic Air Contaminants | 1 through 6 |

U6 Equipment:³²

| Emission Point | Description | Applicable Regulation | Control ID | Stack ID | Installation Date |
|-----------------------|---|------------------------------|-------------------|-----------------|--------------------------|
| E6 | One (1) weld flaw paint marking system for weld mills (U1) | STAR*, 7.08, 7.59 | N/A | N/A | 2008 |
| E22a | One (1) ID painting with drying oven for LEMT galvanizing line (U2) | | C22 | S22 | 2012 |
| E22b | One (1) flow coating for applying sealer for LEMT galvanizing line (U2) | | N/A | N/A | |
| E13-A7 | Threaded ends coating for thread line (U4) | | N/A | N/A | 2008 |
| E13-B6 | Threaded ends coating for thread line (U4) | | N/A | N/A | 2008 |
| E13-C6 | Threaded ends coating for thread line (U4) | | N/A | N/A | 2008 |
| E102 | Aerosol touch up coating operation | | N/A | N/A | 2008 |

* STAR rules consist of Regulation 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23.

³² This unit was previously permitted by construction permit 588-08-C, 589-08-C, 692-08-C, 693-08-C, and 35226-12-C.

U6 Control Devices:

| Control ID | Description | Control Efficiency | Performance Indicator | Stack ID |
|-------------------|---|-----------------------------|------------------------------|-----------------|
| C22 | One (1) thermal oxidizer, make Catalytic Products ³³ | 95% (District pre-approved) | N/A | S22 |

³³ The Thermal oxidizer (C22) is required to be utilized only when solvent-based paints are used for this unit. Since 2012, Republic Conduit has switched from solvent-based paint to water-based paint for ID painting and stopped using Thermal oxidizer (C22). The permit conditions are based on water-based paints. If Republic Conduit plans to use solvent-based paint for ID painting, a permit application needs to be submitted and get the District's approval.

U6 Specific Conditions

S1. Standards (Regulation 2.17, section 5.1)

a. VOC

- i. No coating shall be used with a VOC content, as applied, in excess of the following limits during a calendar month averaging period:
(Regulation 7.59, section 3.1)

| Coating | VOC lb/gal | VOC kg/l |
|------------------------------|-----------------------|---------------------|
| Clear coatings | 4.3 | 0.52 |
| Air-dried coatings | 3.5 | 0.42 |
| Extreme performance coatings | 3.5 | 0.42 |
| All other coatings | 3.0 | 0.36 |

- ii. See Plant-wide Requirements S1.a.

b. Opacity

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

c. PM

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr from each of the paint coating operations based on actual operating hours in a calendar day.³⁴ (Regulation 7.08, section 3.1.2)

d. HAP

The owner or operator shall not use any spray application coatings, additives, catalyst, solvents, or thinners containing target HAP compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), or perform any paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), in the paint removal process.³⁵

³⁴ It has been demonstrated that the PM emissions from each of the paint coating operations cannot exceed the lb/hr PM emission standard uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission standard.

³⁵ The equipment or processes covered by this permit is not currently subject to the standards of the NESHAP, 40 CFR 63 Subpart HHHHHH, due to the absence of the target HAPs in the spray coatings and paint stripping compounds.

e. **TAC**

See Plant-wide Requirements S1.d.³⁶

S2. **Monitoring and Record Keeping** (Regulation 2.17, section 5.2)

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

a. **VOC**

- i. An owner or operator of an affected facility subject to this regulation shall maintain records that include, but not be limited to, the following: (Regulation 7.59, section 6.1)
 - 1) The regulation and section number applicable to the affected facility for which the records are being maintained,
 - 2) The application method and substrate type (metal, plastic, etc.),
 - 3) The amount and type of coatings (including catalyst and reducer for multi-component coatings) and solvent (including exempt compounds) used at each point of application during the calendar month.
 - 4) The VOC content as applied in each coating and solvent,
 - 5) The date, or usage record period, for each application of coating and solvent,
 - 6) The amount of surface preparation, clean-up, wash-up of solvent (including exempt compounds) used and the VOC content of each material used during the calendar month.
- ii. The VOC content shall be calculated using a percent solids basis (excluding water and exempt solvents) for coatings using EPA Method 24. (Regulation 7.59, section 6.2)
- iii. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc.
- iv. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month total VOC emissions each calendar month to demonstrate compliance with the hundred (100) ton per year limit.

³⁶ The potential TAC emissions from each of the paint coating operations are de minimis.

v. See Plant-wide Requirement S2.a.

b. Opacity

i. The owner or operator shall inspect the filters in the LEMT ID paint booth at least monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.

ii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters of the LEMT ID paint booth and if filters were replaced.

c. PM

There are no monitoring and recording keeping requirements for PM.

d. HAP

The owner or operator shall keep a record of the MSDS for each raw material.

e. TAC

See Plant-wide Requirements S2.b.

S3. Reporting (Regulation 2.17, section 5.2)

a. VOC

i. The owner or operator shall report any deviations from the requirement of using coatings with compliant VOC contents, as specified in Specific Condition S1.a.ii. The following information shall be included in the annual compliance reports:

- 1) Emission Unit ID number and emission point or stack ID number;
- 2) The beginning and ending date of the reporting period;
- 3) Identification of all periods of using noncompliant coatings; and
- 4) If no deviations occur during a semi-annual reporting period, the report shall contain a negative declaration.

ii. See Plant-wide Requirement S3.a.

b. **Opacity**

i. The owner or operator shall report any deviations from the opacity requirements. The following information shall be included in the annual compliance reports:

- 1) Emission Unit ID number and emission point or stack ID number;
- 2) The beginning and ending date of the reporting;
- 3) Identification of any deviation from the requirement to perform monthly visible inspections of the filters in the LEMT ID paint booth;
- 4) Identification of any deviation from the requirement to record the results of monthly visible inspections of the filters in the LEMT ID paint booth;
- 5) If no deviations occur during a semi-annual reporting period, the report shall contain a negative declaration.

c. **PM**

There are no routine reporting requirements for PM.

d. **HAP**

There are no routine reporting requirements for HAP.

e. **TAC**

See Plant-wide Requirements S3.b.

Insignificant Activities³⁷

| Equipment | Quan. | PTE (tpy) | Regulation Basis |
|---|--------------|-------------------------|-------------------------------|
| Lime silo with baghouse used for water treatment plant ³⁸ (See Note 7) | 1 | 1.34 PM ₁₀ | Regulation 1.02, section 1.38 |
| Cold solvent parts washers, each equipped with a secondary reservoir ³⁹ (See Note 8) | 9 | 0.01 VOC | Regulation 1.02, Appendix A |
| Emergency generator, 535 HP (See unit IA1) | 1 | 4.15 NOx | Regulation 1.02, section 1.38 |
| Metallurgical zinc recovery system | 1 | 0.0007 PM ₁₀ | Regulation 1.02, section 1.38 |
| Storage tanks (See unit IA2) | 30 | 0.58 VOC | Regulation 1.02, Appendix A |
| Temporary storage totes (See unit IA2) | < 172 | 0.03 VOC | Regulation 1.02, Appendix A |

- 1) Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
- 2) Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
- 3) The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.
- 4) Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
- 5) The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
- 6) The District has determined that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.
- 7) The lime silo is subject to Regulation 7.08 and subject to 2.34 lb/hr PM standard and 20% opacity standard. It has been demonstrated that the lime silo cannot exceed the PM and opacity uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirement for this equipment.
- 8) The parts washers are subject to Regulation 6.18 and shall comply with all the requirements in this regulation.

³⁷ The plant repair or maintenance activities not related to source's primary business activity, including the blast clean unit previously permitted by 442-08-C, are trivial activities.

³⁸ The lime silo was previously permitted by 26-05-C. The District has determined that there are no air pollutant emissions from collection sump, equalization tank, lime slurry recirculation tank, neutralization tanks, clarifier, filter press, sludge contact tank, gravity filters, post neutralization tank, and effluent monitoring tank.

³⁹ These parts washers were previously permitted by 27-05-C, 20-10-C, and 54-10-C.

Emission Unit IA1: Emergency Generator

IA1 Applicable Regulations:

| FEDERALLY ENFORCEABLE REGULATIONS | | |
|--|--|---|
| Regulation | Title | Applicable Sections |
| 40 CFR 63, Subpart ZZZZ | National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines | 63.6603, 6604, 6605, 6625, 6640, 6645, 6655 |

| DISTRICT ONLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 5.00 | Definitions | 1, 2 |
| 5.01 | General Provisions | 1 through 2 |
| 5.02 | Adoption of National Emission Standards for Hazardous Air Pollutants | 1 and 4 |
| 5.14 | Hazardous Air Pollutants and Source Categories | 1, 2 |
| 5.20 | Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant | 1 through 6 |
| 5.21 | Environmental Acceptability for Toxic Air Contaminants | 1 through 5 |
| 5.22 | Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant | 1 through 5 |
| 5.23 | Categories of Toxic Air Contaminants | 1 through 6 |

IA1 Equipment:

| Emission Point | Description | Applicable Regulation | Control ID | Stack ID |
|--|---|------------------------------|-------------------|-----------------|
| E60 | One (1) 535 HP (399 kW) emergency generator, make Cummins, model DFCC-5740131, engine model NTA855-03. Model year 2005 (Tier 2) ⁴⁰ | 40 CFR 63, ZZZZ, STAR* | N/A | S60 |
| * STAR rules consist of Regulation 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23. | | | | |

IA1 Control Devices:

There are no control devices associated with this equipment.

⁴⁰ This engine is subject to 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, because it involves a stationary reciprocating internal combustion engine (RICE) located at an area source of HAP emissions. This engine is not subject to subject 40 CFR 60, Subpart IIII since the engine was manufactured in 2005. This emergency generator was previously permitted by 443-08-C.

Specific Conditions

S1. Standards (Regulation 2.17, section 5.2)

a. HAP

- i. For an existing stationary CI RICE located at an area source of HAP emissions, the owner or operator shall comply with the applicable emission limitations, operating limitations, and other requirements no later than May 3, 2013. (40 CFR 63.6595(a)(1))
- ii. Beginning January 1, 2015, if you own or operate an existing emergency CI stationary RICE with a site rating of more than 100 brake HP and a displacement of less than 30 liters per cylinder that uses diesel fuel and operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in 40 CFR 63.6640(f)(4)(ii), you must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. (40 CFR 63.6604(b))
 - 1) Sulfur content: 15 parts per million (ppm) maximum for NR diesel fuel. (40 CFR 80.510(b)(1)(i))
 - 2) A minimum cetane index of 40; or (40 CFR 80.510(b)(2)(i))
 - 3) A maximum aromatic content of 35 volume percent. (40 CFR 80.510(b)(2)(ii))
- iii. The owner or operator of an existing stationary RICE located at an area source of HAP emissions shall comply with the requirements Table 2(d) to this subpart, as the following: (40 CFR 63.6603(a))
 - 1) The owner or operator shall change the oil and filter every 500 hours of operation or annually, whichever comes first. The owner or operator has the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) or (j) in order to extend the specified oil change requirement in Table 2d of this subpart. (40 CFR 63, Subpart ZZZZ, Table 2d.(4)(a))
 - 2) The owner or operator shall inspect the air cleaners every 1,000 hours of operation or annually, whichever comes first, and replace as necessary. (40 CFR 63. Subpart ZZZZ, Table 2d.(4)(b))
 - 3) The owner or operator shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. (40 CFR 63. Subpart ZZZZ, Table 2d.(4)(c))

- iv. General requirements for complying with 40 CFR 63, Subpart ZZZZ:
 - 1) The owner or operator shall be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to the RICE at all times. (40 CFR 63.6605(a))
 - 2) At all times the owner or operator shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR 63.6605(b))
- v. The owner or operator shall demonstrate continuous compliance with each emission limitation, operating limitation, and other applicable requirements in Tables 2d to this subpart. (40 CFR 63.6640(a))
- vi. The owner or operator shall report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in 40 CFR 63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE. (40 CFR 63.6640(b))
- vii. The owner or operator shall operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) below, is prohibited. If the owner or operator does not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an

emergency engine under this subpart and must meet all requirements for non-emergency engines. (40 CFR 63.6640(f))

- 1) There is no time limit on the use of the emergency stationary RICE in emergency situations. (40 CFR 63.6640(f)(1))
- 2) The owner or operator may operate the emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2). (40 CFR 63.6640(f)(2))
 - (a) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. (40 CFR 63.6640(f)(2)(i))
 - (b) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies, or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3. (40 CFR 63.6640(f)(2)(ii))
 - (c) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency. (40 CFR 63.6640(f)(2)(iii))
- 3) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency

situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (40 CFR 63.6640(f)(4))

- (a) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system. (40 CFR 63.6640(f)(4)(i))
- (b) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: (40 CFR 63.6640(f)(4)(ii))
 - (i) The engine is dispatched by the local balancing authority or local transmission and distribution system operator. (40 CFR 63.6640(f)(4)(ii)(A))
 - (ii) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. (40 CFR 63.6640(f)(4)(ii)(B))
 - (iii) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. (40 CFR 63.6640(f)(4)(ii)(C))
 - (iv) The power is provided only to the facility itself or to support the local transmission and distribution system. (40 CFR 63.6640(f)(4)(ii)(D))

- (v) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator. (40 CFR 63.6640(f)(4)(ii)(E))

b. TAC

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*.⁴¹ (Regulations 5.00 and 5.21)

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. HAP

- i. Monitoring, installation, collection, operation, and maintenance requirements: (40 CFR 63.6625)
 - 1) The owner or operator shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6625(e))
 - 2) The owner or operator shall install a non-resettable hour meter if one is not already installed. (40 CFR 63.6625(f))
 - 3) The owner or operator shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup. (40 CFR 63.6625(h))

⁴¹ It has been demonstrated that the uncontrolled TAC emissions from this equipment are *de minimis*. Therefore there are no monitoring, record keeping, and reporting requirements with respect to STAR compliance.

- 4) The owner or operator has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (40 CFR 63.6625(i))
- ii. Recordkeeping requirements: (40 CFR 63.6655)
 - 1) The owner or operator shall keep the following records that apply to your RICE: (40 CFR 63.6655(a))
 - (a) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv). (40 CFR 63.6655(a)(1))
 - (b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. (40 CFR 63.6655(a)(2))
 - (c) Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii). (40 CFR 63.6655(a)(3))

- (d) Records of all required maintenance performed on the air pollution control and monitoring equipment. (40 CFR 63.6655(a)(4))
 - (e) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (40 CFR 63.6655(a)(5))
- 2) The owner or operator shall keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to the RICE, as the following: (40 CFR 63.6655(d))
- (a) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or (Table 6, section 9)
 - (b) Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (Table 6, section 9)
- 3) The owner or operator shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan. (40 CFR 63.6655(e))
- 4) The owner or operator shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in 40 CFR 63.6640(f)(2)(ii) or (iii) or 40 CFR 63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. (40 CFR 63.6655(f))

b. **TAC**

There are no monitoring and record keeping requirements for this pollutant.

S3. **Reporting** (Regulation 2.17, section 5.2)

The owner or operator shall timely report abnormal conditions or operational changes which may cause excess emissions.

a. **HAP**

If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. (40 CFR 63, Subpart ZZZZ, Footnote 2 of Table 2d)

b. **TAC**

There are no reporting requirements for this pollutant.

Emission Unit IA2: Storage Tanks and Totes**IA2 Applicable Regulations:**

| FEDERALLY ENFORCEABLE REGULATIONS | | |
|--|--|----------------------------|
| Regulation | Title | Applicable Sections |
| 7.12 | Standard of Performance for New Storage Vessels for volatile Organic Compounds | 1 through 8 |

| DISTRICT ONLY ENFORCEABLE REGULATIONS | | |
|--|---|----------------------------|
| Regulation | Title | Applicable Sections |
| 5.00 | Definitions | 1, 2 |
| 5.01 | General Provisions | 1 through 2 |
| 5.14 | Hazardous Air Pollutants and Source Categories | 1, 2 |
| 5.20 | Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant | 1 through 6 |
| 5.21 | Environmental Acceptability for Toxic Air Contaminants | 1 through 5 |
| 5.22 | Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant | 1 through 5 |
| 5.23 | Categories of Toxic Air Contaminants | 1 through 6 |

IA2 Equipment:

| Emission Point | Description | Applicable Regulation | Control ID | Stack ID |
|--|---|------------------------------|-------------------|-----------------|
| E100 | Storage tanks and temporary storage totes with various contents and capacity. See following equipment list. | STAR*, 7.12 | N/A | N/A |
| * STAR rules consist of Regulation 5.00, 5.01, 5.20, 5.21, 5.22, and 5.23. | | | | |

IA2 Control Devices:

There are no control devices associated with this equipment.

Storage Tanks

| Tank ID | Contents | Capacity (gallon) | Applicable Regulations |
|----------------|-----------------|--------------------------|-------------------------------|
| T-2 | Paint | 12,750 | STAR, 7.12 |
| T-3 | Naphtha | 5,600 | STAR, 7.12 |
| T-5 | Sulfuric Acid | 10,000 | STAR |

| | | | |
|------|--|-------|------|
| T-7 | Nitric Acid (68% conc.) | 5,000 | STAR |
| T-9 | Sodium Hydroxide | 5,000 | N/A |
| T-10 | SEMT Process Sulfuric Acid | 8,000 | STAR |
| T-11 | LEMT Process Sulfuric Acid | 8,000 | STAR |
| T-12 | Process Chromate | 1,500 | N/A |
| T-13 | Process Nitric Acid | 1,500 | STAR |
| T-15 | Process Blended Cleaner | 6,000 | N/A |
| T-18 | Sulfuric Acid/Hydrochloric Acid | 6,604 | STAR |
| T-19 | Sulfuric Acid/Hydrochloric Acid | 3,180 | STAR |
| T-20 | Sulfuric Acid/Hydrochloric Acid | 6,604 | STAR |
| T-21 | Sulfuric Acid/Hydrochloric Acid | 6,604 | STAR |
| T-22 | Sulfuric Acid/Hydrochloric Acid | 6,604 | STAR |
| T-23 | Ammonia Hydroxide (portable tote) | 264 | N/A |
| T-25 | Sulfuric Acid | 450 | STAR |
| T-28 | Process Electrolyte Settling Tank | 1,500 | N/A |
| T-29 | Electrolyte Recirculation Feed Pump Tank | 700 | N/A |
| T-31 | Sodium Sulfate Mix Tank | 2,000 | N/A |
| T-32 | Process Electrolyte | 3,500 | N/A |
| T-40 | Potassium Hydroxide | 5,000 | N/A |
| T-41 | Nitric Acid | 100 | STAR |
| T-42 | Nitric Acid/Chromic Acid | 150 | STAR |
| T-43 | Sulfuric Acid | 135 | STAR |
| T-50 | Sulfuric Acid/Hydrochloric Acid | 6,604 | STAR |
| T-51 | Sulfuric Acid/Hydrochloric Acid | 6,604 | STAR |
| T-52 | Sulfuric Acid/Hydrochloric Acid | 3,180 | STAR |
| T-60 | Magnesium bi-sulfite | 600 | N/A |
| T-61 | Magnesium bi-sulfite | 600 | N/A |

Storage Totes

| Tote Materials | Content | Quan. | Capacity (gallon) | Applicable Regulations |
|------------------------|----------------------|-------|-------------------|------------------------|
| GIM Cleaner PN | HF/Nitric Acid | 2 | 350 | STAR |
| Technicote ZNBL 340 | Chromic/ Nitric Acid | 30 | 350 | STAR |
| Technicote 90 GM | Chromic/ Nitric Acid | 20 | 350 | STAR |
| Ammonia Solution | Ammonia | 5 | 350 | N/A |
| 1760 Chemical | | 20 | 350 | N/A |
| Sulfuric Acid Breentag | Sulfuric Acid | 20 | 350 | STAR |
| Techniclean AC710 | Phosphoric Acid | 30 | 350 | STAR |
| Anionic Polymer | Petroleum distillate | 50 | 350 | STAR , 7.12 |
| Multan 2307GT | Tri-ethanolamine | 40 | 350 | N/A |
| Waste Oil | | 40 | 350 | 7.12 |

| Tote Materials | Content | Quan. | Capacity (gallon) | Applicable Regulations |
|-----------------------------|----------------|--------------|------------------------------|-----------------------------------|
| AW46 Lubricants | | 2 | 350 | 7.12 |
| Ferric Chloride Brenntag | | 5 | 350 | N/A |
| Magnesium Bi-sulfate | | 30 | 350 | N/A |
| Sodium Hydroxide | | 5 | 350 | N/A |
| Hydrogen Peroxide | | 2 | 350 | N/A |
| Flux ZnCl NH3Cl4 | | 20 | 350 | N/A |
| Ferrous Sulfate | | 25 | 350 | N/A |

Specific Conditions

S1. Standards (Regulation 2.17, section 5.2)

a. VOC

- i. The owner or operator shall not store materials with an as stored vapor pressure of greater than or equal to 1.5 psia in the storage vessel(s), unless the storage tank is equipped with a permanent submerged fill pipe. (Regulation 7.12, section 3.3)
- ii. See Plant-wide Requirements S1.a.

b. TAC

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be *de minimis*.⁴² (Regulations 5.00 and 5.21)

S2. Monitoring and Record Keeping (Regulation 2.17, section 5.2)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

a. VOC

- i. The owner or operator of the storage vessel(s) shall maintain records of the material stored and the vapor pressure in each storage vessel and if the contents of the storage vessel(s) are changed a record shall be made of the new contents, the date of the change, and the new vapor pressure in order to demonstrate compliance with Specific Condition S1.
- ii. The owner or operator shall keep a record that shows if the storage vessel is equipped with a submerged fill pipe. Submerged fill pipe means any fill pipe the discharge of which is entirely submerged when the liquid level is 6 inches above the bottom of the tank; or when applied to a tank which is loaded from the side, shall mean every fill pipe the discharge opening of which is entirely submerged when the liquid level is 2 times the fill pipe diameter above the bottom of the tank.
- iii. See Plant-wide Requirement S2.a.

⁴² It has been demonstrated that the uncontrolled TAC emissions from this equipment are *de minimis*. Therefore there are no monitoring, record keeping, and reporting requirements with respect to STAR compliance.

b. **TAC**

There are no monitoring and record keeping requirements for this pollutant.

S3. **Reporting** (Regulation 2.17, section 5.2)

The owner or operator shall timely report abnormal conditions or operational changes which may cause excess emissions.

a. **VOC**

i. There are no compliance reporting requirements for this equipment.

ii. See Plant-wide Requirement S3.a.

b. **TAC**

There are no reporting requirements for this pollutant.

**Attachment A - 40 CFR 63, Subpart WWWW (MACT)
National Emission Standards for Hazardous Air Pollutants: Area Source Standards for
Plating and Polishing Operations⁴³**

The owner or operator shall comply with the following requirements unless there are more current promulgated regulations:

Specific Conditions

S1. Standards (Regulation 2.17, section 5.2)

a. Compliance date (40 CFR 63.11505)

If you own or operate an existing affected source, you must achieve compliance with the applicable provisions of this subpart no later than July 1, 2010.⁴⁴ (40 CFR 63.11506(a))

b. Standards and management practices (40 CFR 63.11507)

i. If you own or operate an affected new or existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP, you must implement the applicable management practices in paragraphs (g)(1) through (12) of this section, as practicable. (40 CFR 63.11507(g))

1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements. (40 CFR 63.11507(g)(1))

2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable. (40 CFR 63.11507(g)(2))

3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the

⁴³ The LEMT Electro Galvanizing line and Hot Dip Galvanizing line are subject to 40 CFR 63, Subpart WWWW according to 40 CFR 63.11504(a)(1). Per 40 CFR 63.11505, each tank and each thermal spraying operation that contains or spray one or more of the plating and polishing metal HAP (Cd, Cr, Pb, Mn, and Ni) are covered by this subpart.

⁴⁴ According to 40 CFR 63.11505(b), an affected source is existing if you commenced construction or reconstruction of the affected source on or before March 14, 2008. The LEMT Electro Galvanizing line and Hot Dip Galvanizing line were installed in 2006, therefore they are existing sources.

- tank solution to drip back into the tank), as practicable. (40 CFR 63.11507(g)(3))
- 4) Use tank covers, if already owned and available at the facility, whenever practicable. (40 CFR 63.11507(g)(4))
 - 5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality). (40 CFR 63.11507(g)(5))
 - 6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable. (40 CFR 63.11507(g)(6))
 - 7) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable. (40 CFR 63.11507(g)(7))
 - 8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable. (40 CFR 63.11507(g)(8))
 - 9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable. (40 CFR 63.11507(g)(9))
 - 10) Minimize spills and overflow of tanks, as practicable. (40 CFR 63.11507(g)(10))
 - 11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable. (40 CFR 63.11507(g)(11))
 - 12) Perform regular inspections to identify leaks and other opportunities for pollution prevention. (40 CFR 63.11507(g)(12))

S2. Monitoring, Record Keeping, and Reporting (Regulation 2.17, section 5.2)

a. Compliance requirements (40 CFR 63.11508)

- i. If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with 40 CFR 63.11509(b) of “What are my notification, reporting, and recordkeeping requirements?”⁴⁵ (40 CFR 63.11508(a))

⁴⁵ Republic Conduit submitted the Initial Notification of Compliance on April 22, 2009.

- ii. You must be in compliance with the applicable management practices and equipment standards in this subpart at all times. (40 CFR 63.11508(b))
 - iii. To demonstrate continuous compliance with the applicable management practices and equipment standards specified in this subpart, you must satisfy the requirements specified in paragraphs (d)(1) through (8) of this section. (40 CFR 63.11508(d))
 - 1) You must always operate and maintain your affected source, including air pollution control equipment. (40 CFR 63.11508(d)(1))
 - 2) You must prepare an annual compliance certification according to the requirements specified in 40 CFR 63.11509(c), “Notification, Reporting, and Recordkeeping,” and keep it in a readily-accessible location for inspector review. (40 CFR 63.11508(d)(2))
 - 3) If you own or operate an affected tank or other operation that is subject to the management practices specified in 40 CFR 63.11507(g), “What are my standards and management practices?”, you must demonstrate continuous compliance according to paragraphs (d)(8)(i) and (ii) of this section. (40 CFR 63.11508(d)(8))
 - (a) You must implement the applicable management practices during all times that the affected tank or process is in operation. (40 CFR 63.11508(d)(8)(i))
 - (b) You must state in your annual compliance certification that you have implemented the applicable management practices, as practicable. (40 CFR 63.11508(d)(8)(ii))
- b. **Notification, reporting, and recordkeeping requirements** (40 CFR 63.11509)
- i. If you own or operate an affected source, as defined in 40 CFR 63.11505(a), “What parts of my plant does this subpart cover?”, you must submit an Initial Notification in accordance with paragraphs (a)(1) through (4) of this section by the dates specified. (40 CFR 63.11509(a))
 - 1) The Initial Notification must include the information specified in 40 CFR 63.9(b)(2)(i) through (iv) of the General Provisions of this part. (40 CFR 63.11509(a)(1))

- 2) The Initial Notification must include a description of the compliance method (e.g., use of wetting agent/fume suppressant) for each affected source. (40 CFR 63.11509(a)(2))
 - 3) If you start up your affected source on or before July 1, 2008, you must submit an Initial Notification not later than 120 calendar days after July 1, 2008. (40 CFR 63.11509(a)(3))
 - 4) If you startup your new affected source after July 1, 2008, you must submit an Initial Notification when you become subject to this subpart. (40 CFR 63.11509(a)(4))
- ii. If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with paragraphs (b)(1) through (3) of this section. (40 CFR 63.11509(b))
- 1) The Notification of Compliance Status must be submitted before the close of business on the compliance date specified in 40 CFR 63.11506, "What are my compliance dates?" (40 CFR 63.11509(b)(1))
 - 2) The Notification of Compliance Status must include the items specified in paragraphs (b)(2)(i) through (iv) of this section. (40 CFR 63.11509(b)(2))
 - (a) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources. (40 CFR 63.11509(b)(2)(i))
 - (b) Methods used to comply with the applicable management practices and equipment standards. (40 CFR 63.11509(b)(2)(ii))
 - (c) Description of the capture and emission control systems used to comply with the applicable equipment standards. (40 CFR 63.11509(b)(2)(iii))
 - (d) Statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements. (40 CFR 63.11509(b)(2)(iv))
 - 3) If a facility makes a change to any items in (b)(2)(i), iii, and (iv) of this section that does not result in a deviation, an amended Notification of Compliance Status should be submitted within 30 days of the change. (40 CFR 63.11509(b)(3))

- iii. If you own or operate an affected source, you must prepare an annual certification of compliance report according to paragraphs (c)(1) through (7) of this section. These reports do not need to be submitted unless a deviation from the requirements of this subpart has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report. (40 CFR 63.11509(c))
 - 1) If you own or operate an affected tank or other affected plating and polishing operation that is subject to the management practices specified in 40 CFR 63.11507(g), “What are my standards and management practices?” you must state in your annual compliance certification that you have implemented the applicable management practices, as practicable. (40 CFR 63.11509(c)(6))
 - 2) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period. (40 CFR 63.11509(c)(7))
- iv. If you own or operate an affected source, and any deviations from the compliance requirements specified in this subpart occurred during the year, you must report the deviations, along with the corrective action taken, and submit this report to the delegated authority. (40 CFR 63.11509(d))
- v. You must keep the records specified in paragraphs (e)(1) through (3) of this section. (40 CFR 63.11509(e))
 - 1) A copy of any Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications. (40 CFR 63.11509(e)(1))
 - 2) The records specified in 40 CFR 63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of this part. (40 CFR 63.11509(e)(2))
 - 3) The records required to show continuous compliance with each management practice and equipment standard that applies to you, as specified in 40 CFR 63.11508(d), “What are my compliance requirements?” (40 CFR 63.11509(e)(3))

vi. You must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1) of the General Provisions to part 63. You may keep the records offsite for the remaining 3 years. (40 CFR 63.11509(f))

c. **General Provisions apply to this subpart** (40 CFR 63.11510)

If you own or operate a new or existing affected source, you must comply with the requirements of the General Provisions (40 CFR part 63, subpart A) according to Table 1 of this subpart.

Table 1 to Subpart WWWW of Part 63 —Applicability of General Provisions to Plating and Polishing Area Sources

| Citation | Subject |
|--|---|
| 63.1 ¹ | Applicability. |
| 63.2 | Definitions. |
| 63.3 | Units and abbreviations. |
| 63.4 | Prohibited activities. |
| 63.6(a), (b)(1)–(b)(5), (c)(1), (c)(2), (c)(5), and (j) | Compliance with standards and maintenance requirements. |
| 63.10(a), (b)(1), (b)(2)(i)–(iii),(xiv), (b)(3), (d)(1), (f) | Recordkeeping and reporting. |
| 63.12 | State authority and delegations. |
| 63.13 | Addresses of State air pollution control agencies and EPA regional offices. |
| 63.14 | Incorporation by reference. |
| 63.15 | Availability of information and confidentiality. |

¹ Section 63.11505(e), “What parts of my plant does this subpart cover?”, exempts affected sources from the obligation to obtain title V operating permits.

Attachment B - Calculation Methods and Emission Factors

For weld mills (U1), LEMT electro galvanizing line (U2), hot dip galvanizing line (U3), and thread line (U4), emission factors are shown in the following table. If emission factors were determined by stack test results, the owner or operator shall retest the emission unit within ten (10) years since the most recent District accepted stack test, according to Attachment C – General Testing Requirements.

| Unit ID | Emission Point Description | Pollutants | Emission Factors Unit | Uncontrolled Emission Factors | Controlled Emission Factors | Emission Factor Sources | Projected Retest Date Prior to... |
|-------------|----------------------------|---------------------|-----------------------|-------------------------------|-----------------------------|-------------------------|-----------------------------------|
| U1 | Weld mills | PM/PM ₁₀ | lb/ton | 0.0036 | 0.0018 | Stack test, July 2008 | July 2018 |
| | | VOC | lb/ton | 0.0446 | | Company's analysis | |
| U2 | LEMT line | PM/PM ₁₀ | lb/ton | 0.042 | 0.007 | Stack test, April 2010 | April 2020 |
| | | Chromium (Cr) VI | lb/ton | 1.4E-06 | 1.4E-06 | Stack test, April 2012 | April 2022 |
| | | Chromium (Cr) III | lb/ton | 1.7E-06 | 1.6E-06 | | |
| | | Sulfuric Acid | lb/ton | 1.6E-02 | 1.2E-03 | | |
| Nitric Acid | lb/ton | 2.0E-04 | 3.7E-03 | | | | |
| U3 | Hot dip line-Pickling | PM/PM ₁₀ | lb/ton | 0.005 | 0.005 | Stack test, April 2010 | April 2020 |
| | Hot dip line-Galvanizing | PM/PM ₁₀ | lb/ton | 0.308 | 0.005 | | |
| | Hot dip line | Hydrochloric Acid | lb/ton | 0.082 | 0.003 | Stack test, April 2010 | April 2020 |
| | | Chromium (Cr) VI | lb/ton | 4.6E-03 | 4.6E-04 | Stack test, July 2008 | July 2018 |
| | | Chromium (Cr) III | lb/ton | 1.0E-03 | 1.0E-04 | | |
| | | Cadmium (Cd) | lb/ton | 6.3E-07 | 2.0E-08 | MSDS | |
| Lead (Pb) | lb/ton | 1.6E-06 | 5.2E-08 | | | | |
| U4 | Thread line | VOC | lb/ton | 0.021 | | Company's analysis | |

For natural gas-fired boilers (U5), emission factors from AP-42, 1.4, Natural Gas Combustion, shall be used for emission calculations.

For paint coating operations (U6), emissions shall be calculated using mass balance method and based on pollutant contents in material safety data sheet (MSDS).

For internal combustion engine, emission factors from AP-42, 3.3, Gasoline and Diesel Industrial Engines, shall be used for emission calculations.

Attachment C - General Testing Requirements

If testing is not required by the regulation but stack test results are used for emission calculations, plant-wide the owner or operator shall retest the control devices within ten (10) years since the most recent District accepted performance test or within 180 days after the effective date of the permit if no previous test has been performed. For equipment which has been tested but not within ten years prior to the effective date of this permit the Company may submit within 90 days of the effective date of this permit, contingent on approval by the District, a schedule which shall at a minimum propose testing for all affected equipment within this permit cycle. Thereafter the Company shall retest each affected device at least once every 10 years. Devices of adequately similar design and filter media may be represented by a common performance test contingent upon review and approval by the District of the testing protocol. In lieu of the control efficiency testing, unless required by a Federal Regulation, the owner or operator may use the District pre-approved control efficiency or submit a signature guarantee from the control device manufacture stating the control device efficiency.

The owner or operator shall conduct performance testing in a manner consistent with the following testing requirements.

- i. The owner or operator shall perform an EPA Reference Method (or equivalent methods that approved by the District) performance test. The test shall be performed at 90% or higher of maximum capacity, or allowable/permitted capacity, or at a level of capacity which results in the greatest emissions and is representative of the operations. Failure to perform the test, at maximum capacity, allowable/permitted capacity, or at a level of capacity which resulted in the greatest emissions, may necessitate a re-test or necessitate a revision of the allowable/permitted capacity of the process equipment depending upon the difference between the testing results and the limit.
- ii. The owner or operator shall perform a capture efficiency test using EPA guidelines. In lieu of performing a capture efficiency test, the owner or operator may submit a reasonable estimate of capture efficiency with thorough justification subject to approval by the District.
- iii. The owner or operator shall submit written compliance test plans (protocol) for the control efficiency and capture efficiency. They shall include the EPA test methods that will be used for compliance testing, the process operating parameters that will be monitored during the performance test, and the control device performance indicators (e.g. pressure drop, minimum combustion chamber temperature) that will be monitored during the performance test. The compliance test plans shall be furnished to the District at least 30 days prior to the actual date of the performance test. Attached to the permit is a Protocol Checklist for Performance Test for the information to be submitted in the protocol.
- iv. The owner or operator shall be responsible for obtaining and analyzing audit samples when the EPA Reference Method is used to analyze samples to demonstrate compliance with the source's emission regulation. The audit samples shall be available for verification by the District during the onsite testing.

- v. The owner or operator shall provide the District at least 10 days prior notice of any performance test to afford the District the opportunity to have an observer present.
- vi. The owner or operator shall furnish the District with a written report of the results of the performance test within 60 days following the actual date of completion of the performance test.
- vii. The owner or operator shall provide written notification to the District of the actual date of initial startup (only required for new equipment). The written notification shall be postmarked within 15 days after the effective date of the permit.

Attachment D - Protocol Checklist for a Performance Test

A completed protocol should include the following information:

- 1. Facility name, location, and ID #;
- 2. Responsible Official and environmental contact names;
- 3. Permit numbers that are requiring the test to be conducted;
- 4. Test methods to be used (i.e. EPA Method 1, 2, 3, 4, and 5);
- 5. Alternative test methods or description of modifications to the test methods to be used;
- 6. Purpose of the test including equipment and pollutant to be tested; the purpose may be described in the permit that requires the test to be conducted or may be to show compliance with a federal regulation or emission standard;
- 7. Tentative test dates (These may change but the District will need final notice at least 10 days in advance of the actual test dates in order to arrange for observation.);
- 8. Maximum rated production capacity of the system;
- 9. Production-rate goal planned during the performance test for demonstration of compliance (if appropriate, based on limits);
- 10. Method to be used for determining rate of production during the performance test;
- 11. Method to be used for determining rate of production during subsequent operations of the process equipment to demonstrate compliance;
- 12. Description of normal operation cycles;
- 13. Discussion of operating conditions that tend to cause worse case emissions; it is especially important to clarify this if worst case emissions do not come from the maximum production rate;
- 14. Process flow diagram;
- 15. The type and manufacturer of the control equipment, if any;
- 16. The control equipment (baghouse, scrubber, condenser, etc.) parameter to be monitored and recorded during the performance test. Note that this data will be used to ensure representative operation during subsequent operations. These parameters can include pressure drops, flow rates, pH, and temperature. The values achieved during the test may be required during subsequent operations to describe what pressure drops, etcetera, are indicative of good operating performance; and
- 17. How quality assurance and accuracy of the data will be maintained, including:
 - Sample identification and chain-of-custody procedures
 - If audit samples are required for this test method, audit sample provider and number of audit samples to be used
- 18. Pipe, duct, stack, or flue diameter to be tested;
- 19. Distances from the testing sample ports to the nearest upstream and downstream flow disturbances such as bends, valves, constrictions, expansions, and exit points for outlet and additionally for inlet;
- 20. Determine number of traverse points to be tested for outlet and additionally for inlet if required using Appendix A-1 to 40 CFR Part 60;
 - Method 1 if stack diameter is >12"
 - Method 1a if stack diameter is greater than or equal to 4" and less than 12"
 - Alternate method of determination for <4"
 - If a sample location at least two stack or duct diameters downstream and half a diameter upstream from any flow disturbance is not available then an alternative procedure is available for determining the acceptability of a measurement location. This procedure described in Method 1, Section 11.5 allows for the determination of gas flow angles at the sampling points and comparison of the measured results with acceptability criteria.
- 21. The Stack Test Review fee shall be submitted with each stack test protocol.

Fee Comment

On May 15, 2013, the Board approved revisions to Regulation 2.08, which implemented a new fee structure. As a result, Republic Conduit will be required to pay the initial issuance fee as well as annual fees.

The initial issuance fee for a FEDOOP is \$2,582.58, EA Demo review fee is \$1,549.55, and NESHAP review fee is \$516.52, in accordance with the Schedule of Fees table, Regulation 2.08, section 12.9.6. The total fee is \$4,648.65. This fee shall be paid to the District prior to the issuance of the permit.