

**Bay Area Air Quality Management District**

939 Ellis Street  
San Francisco, CA 94109  
(415) 771-6000

**Permit Evaluation  
and  
Statement of Basis  
for  
Renewal  
of the**

**MAJOR FACILITY REVIEW PERMIT**

**for  
USS-POSCO Industries  
Facility # A2371**

**Facility Address:**  
900 Loveridge Road  
Pittsburg, CA 94565

**Mailing Address:**  
PO Box 471  
Pittsburg, CA 94565

October 2012

Application Engineer: Janice Wu  
Site Engineer: Pamela J. Leong

Application: 18038

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## **Title V Statement of Basis**

### **A. Background**

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the “potential to emit,” as defined by BAAQMD Regulation 2-6-218, of more than 100 tons per year of a regulated air pollutant.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Pursuant to Regulation 2, Rule 6, section 416, the District has reviewed the terms and conditions of the Major Facility Review permit and determined that they are still valid and correct. This review included an analysis of applicability determinations for all sources, including those that have been modified or permitted since the issuance of the last renewal Major Facility Review Permit. The review also included an assessment of all monitoring in the permit for sufficiency to determine compliance. The statement of basis documents for permit revisions that have occurred since the initial Major Facility Review permit was issued are hereby incorporated by reference and are available upon request.

Each facility in the Bay Area is assigned a facility identifier that consists of a letter and a 4-digit number. This identifier is also considered to be the identifier for the permit. The identifier for this facility is A2371.

This facility received its initial Title V permit on December 1, 2003. The permit was revised on June 17, 2004. This application 18038 is for a permit renewal. Although the current permit expired on November 30, 2008, it continues in force until the District takes final action on the permit renewal. The standard sections have been updated to include new standard language used in all Title V permits. The proposed permit shows all changes to the permit in strikeout/underline format.

The changes approved in the NSR Applications 10174 and 11346 require a minor revision to the permit. The changes proposed in the Title V Modification Application 10350, which was

cancelled on 11/05/09, were reviewed by USS-POSCO and will be incorporated in this renewal application.

In addition to Applications 10174 and 11346, USS-POSCO has submitted a number of District NSR applications listed in the table below. See appendixes for the copies of engineering evaluation.

Table 1. Summary of Title V Revision/District NSR Applications Included in this Permit Renewal

<b>Type of Revision Requested</b>	<b>District NSR Application #</b>	<b>Project Description</b>
Minor and Significant	10174	Replace existing Phase I system with EVR-certified equipment
	11346	New Cold Cleaners
Minor	16047	New Cold Cleaner
Minor	18406	Change of Condition 7216
Minor	18407	Change of Condition 7216 for S174
Minor	18718	Install and operate HEPA filters for A41 and A42
Minor	19114	Modify chrome plating Condition 7579
Minor	19679	Modify gasoline dispensing facility (GDF) source
Minor	24291	Electrostatic coil oiler

**B. Facility Description**

The USS-POSCO steel finishing plant is owned and operated by USS-POSCO Industries, a joint venture company established by U. S. Steel Corporation and POSCO, of the Republic of Korea. USS-POSCO manufactures cold rolled, galvanized and tin mill products from hot rolled steel produced elsewhere. There has been no significant change in emissions.

**C. Permit Content**

The legal and factual basis for the permit revision follows. The permit sections are described in the order presented in the permit.

## **I. Standard Conditions**

This section contains administrative requirements and conditions that apply to all facilities. If the Title IV (Acid Rain) requirements for certain fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. Many of these conditions derive from 40 CFR § 70.6, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District's General Provisions and Permitting rules.

### Changes to permit:

The dates of adoption and approval of rules in Standard Condition 1.A have been updated. SIP Regulation 2, Rule 4 - Permits, Emissions Banking and BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review have been added to Standard Condition 1.A.

The following language was added to Standard Condition I.B.1: "If the permit renewal has not been issued by [ ], but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application." This is the "application shield" pursuant to BAAQMD Regulation 2-6-407.

Standard Condition I.B.11, which requires the responsible official to certify all documents submitted, was added to conform to changes in Regulation 2, Rule 6.

The following language was added as Standard Condition I.B.12: "The permit holder is responsible for compliance, and certification of compliance, with all conditions of the permit, regardless whether it acts through employees, agents, contractors, or subcontractors. (Regulation 2-6-307)." The purpose is to reiterate that the Permit Holder is responsible for ensuring that all activities at the facility comply with all applicable requirements.

The dates of the reporting periods and reporting deadlines have been added to Standard Conditions I.F and I.G for additional clarity.

Standard Condition I.H was modified to conform to the current standard.

## **II. Equipment**

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S24).

Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Rule 2-1-302.

Significant sources are those sources that have a potential to emit of more than 2 tons per year of a “regulated air pollutant” (as defined in BAAQMD Rule 2-6-222) or 400 pounds per year of a “hazardous air pollutant” (as defined in BAAQMD Rule 2-6-210).

All abatement (control) devices that control permitted or significant sources are listed. Each abatement device whose primary function is to reduce emissions is identified by an A and a number (e.g., A24). If a source is also an abatement device, such as when an engine controls VOC emissions, it will be listed in the abatement device table but will have an “S” number. An abatement device may also be a source (such as a thermal oxidizer that burns fuel) of secondary emissions. If the primary function of a device is to control emissions, it is considered an abatement (or “A”) device. If the primary function of a device is a non-control function, the device is considered to be a source (or “S”).

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Each of the permitted sources has previously been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with state law and the District’s regulations. The capacities in the permitted sources table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

Following are explanations of the differences in the equipment list between the time that the facility was issued a Title V permit on June 17, 2004 and the permit proposal date:

***Devices Removed from Service or Archived since current permit was issued on 6/17/04:***

<b>S-#</b>	<b>Description</b>
S-191	Cold Cleaner
S-194	Cold Cleaner
S-196	Cold Cleaner
S-208	Cold Cleaner
S-214	Cold Cleaner
S-217	Solvent Cleaning Operation
S-218	Cold Cleaner
S-285	Cold Cleaner
S-289	#1 Continuous Galvanize Line-Strip Stenciller
S-300	Cold Cleaner
S-301	Cold Cleaner
S-302	Cold Cleaner
S-303	Cold Cleaner
S-304	Cold Cleaner
S-306	Cold Cleaner

S-#	Description
S-307	Cold Cleaner
S-309	Cold Cleaner
S-310	Cold Cleaner
S-312	Cold Cleaner
S-401	Contaminated Soils

***Devices Permitted Since Application was submitted:***

S-#	Description
S-317	Cold Cleaner, Inland Technology IT48 WC
S-402	Horizontal Electrostatic Coil Oiler, Peabody HO LBO 609
A-24	Tin Free Steel Cell-Fume Scrubber

Changes to permit:

**Table II A - Permitted Sources**

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
43	#1 Continuous Annealing Line - Annealing Furnace, Natural gas only	Surface Combustion	Custom	53 MMbtu/hr
65	#1 Continuous Galvanizing Line - Zinc Coating Pot	Wean Engineering Co.	Custom	30 tph
70	#2 Continuous Galvanizing Line - Annealing Furnace, Natural gas only	Surface Combustion	<a href="#">Unknown</a>	39.9 MMbtu/hr
72	#2 Continuous Galvanizing Line - Zinc Coating Pot	Blaw-Knox, Reliance Electric	Custom	90 tph
80	#1 Electro-Tinning Line – Pickling Section	Blaw-Knox Equipment Inc.	Custom	50 tph
82	#1 Electro-Tinning Line - Chemical Treatment Section	Blaw-Knox Equipment Inc.	Custom	5k amp-hours/hr, 50 tph
91	#3 Electro-Tinning Line – Pickling Section	Wean Engineering Co.	Custom	50 tph

**Table II A - Permitted Sources**

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S-#	Description	Make or Type	Model	Capacity
93	#3 Electro-Tinning Line - Chemical Treatment Section	Wean Engineering Co.	Custom	4k amp-hours/hr, 50 tph
97	Tin Finishing - Tin Anode Casting Pot	Wean Engineering Co.	Unknown	
130	Oil Separation Unit	EIMCO Corp.	Custom	1000 gpm
133	Terminal Water Treatment Plant	U.S. Steel Corp;	Custom	30,000,000 gpd
134	Terminal Water Treatment Plant - Lime Handling	U.S. Steel Corp.	Custom	1 tph
149	Paint Shop Spray Booth (With Filters)	Binks And Dispo Spray Booth, 12000 cfm	Q-114-7M-125	
155	No. 1 Electro-tinning (tin free steel cell)	Aetna Standard; hi-density plating cell		34k amp-hours/hr
158	Gasoline Dispensing Island (Service Station G6331)	Custom	Emco/ Wheaton Nozzle, Model A3003 /A3005	1 gasoline nozzle, 10,000 gallon underground storage tank
166	Pickling Line Coil Processor	MDS – 1800 fpm		535 tph
167	Pickling Line Butt Welder	Miebach – <a href="#">Flash Butt</a>		535 tph
168	Pickling Line Stretch Leveler	MDS, 820 fpm	Custom	535 tph
169	Acid Pickling Line	MDS, 820 fpm	Custom	535 tph
171	Tandem Cold Mill	Hitachi - 7000 fpm		535 tph
173	HCD Alkaline Cleaner	Mitsubishi - USX Design - 2300 fpm		175 tph
174	KM Continuous Annealing Furnace, Natural gas	Kawasaki Multipurpose; <a href="#">95.7E6 BTU/HR</a>	Custom	<a href="#">95.796</a> MMbtu/hr
176	Roll Etch Machine	Jet Wheelblast	RE12	18 tph
177	Iron Oxide Production Roaster - <a href="#">40 gpm</a> ; Natural gas,	ARUS	Spray Roaster	40 gpm, <a href="#">feed</a> 27.6 MMbtu/hr
178	Iron Oxide Silo #1 – <a href="#">100 tons</a>	ARUS	Custom	<del>100 tons</del> <a href="#">2 tph</a>
179	Iron Oxide Bagging Station	ARUS - Expanding Ring Fill Spout		12 tph
180	Acid Gas Absorber #1	ARUS, <del>2.5 tph</del> 18% HCl	Custom	2.5 tph



**Table II A - Permitted Sources**

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
181	Acid Gas Absorber #2	ARUS, <del>0.3 tph</del> 18% HCl	Custom	0.3 tph
182	Iron Oxide Silo #2 <del>100 tons</del>	Arus	Custom	<del>100 tons</del> 2 tph
190	Cold Cleaner	Inland Technology	IT-32, S/N 19933144	32 gallons
<del>191</del>	<del>Cold Cleaner</del>	<del>Inland Technology</del>	<del>IT-32, S/N 39623161</del>	<del>32 gallons</del>
<del>194</del>	<del>Cold Cleaner</del>	<del>Inland Technology</del>	<del>SXL48, S/N 49830035</del>	<del>48 gallons</del>
195	Cold Cleaner	Inland Technology	IT-32, S/N 39829721	32 gallons
<del>196</del>	<del>Cold Cleaner</del>	<del>Inland Technology,</del>	<del>IT-32, S/N 39829724</del>	<del>32 gallons</del>
202	Cold Cleaner	Inland Technology	IT-32	32 gallons
206	Cold Cleaner	System One	500, S/N 5006196	35 gallons
<del>208</del>	<del>Cold Cleaner</del>	<del>System One</del>	<del>500, S/N 050011971 003956</del>	<del>35 gallons</del>
210	Cold Cleaner	Inland Technology	IT-32, S/N 39829722	32 gallons
<del>214</del>	<del>Cold Cleaner</del>	<del>Inland Technology</del>	<del>IT-32, S/N 39829725</del>	<del>32 gallons</del>
215	Cold Cleaner	Inland Technology	IT-32, S/N 39829726	32 gallons
<del>217</del>	<del>Solvent Cleaning Operation</del>	<del>Graymills Liftclean</del>	<del>T2420</del>	<del>47 gallons</del>
<del>218</del>	<del>Solvent Cold Cleaner</del>	<del>Inland Technology</del>	<del>Model 30</del>	<del>30 gallons</del>
<del>285</del>	<del>Cold Cleaner</del>	<del>Custom Bearing Parts Cleaner</del>	<del>Custom</del>	
286	#1 CRU Evaporator - TFS Operation	Eco-Tec, <del>75 gph</del> H2O Evaporator	E-75	75 gph
287	#2 <u>CRU</u> Evaporator - ETL Lines	Eco-Tec, <del>75 gph</del> H2O Evaporator	E-75	75 gph

**Table II A - Permitted Sources**

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
<del>289</del>	<del>#1 Continuous Galvanize Line-Strip Stenciller</del>	<del>Pannier Rotary Printer</del>	<del>DH1-1616-S</del>	
290	#2 Continuous Galvanize Line-Strip Stenciller	Matthews Jet-A-Mark	Model 1104	
292	KMCAL Horizontal Electrostatic Oiler	Trion	Horizontal EFD	68" Width
293	Emergency Standby Generator-TWTP, diesel fueled	Cummins <a href="#">400 kW Diesel Eng; 3.9e6 btu/hr</a>	KTA19- <a href="#">CGS2</a>	600 bhp, <a href="#">400 kW, 3.9e6 btu/hr</a>
294	Emergency Standby Generator-KMCAL, diesel fueled	Cummins <a href="#">125 kW, Diesel Eng; 1.4e6 btu/hr</a>	6CT-8.3	207 bhp, <a href="#">125 kW, 1.4e6 btu/hr</a>
295	Emergency Generator-Filter Plant, diesel fueled	Detroit Diesel <a href="#">220 kW Engine; 2.1e6 btu/hr</a>		300 bhp, <a href="#">220 kW, 2.1e6 btu/hr</a>
296	Standby Generator - #2 CC Line, diesel fueled	Cummins <a href="#">350 kW Diesel Eng; 3.5e6 btu/hr</a>	NTTA-855-GS2	535 bhp, <a href="#">350 kW, 3.5e6 btu/hr</a>
297	Emergency Standby Generator-Computer Bldg, diesel fueled	Cummins <a href="#">150 kW Diesel Eng; 2.5e6 btu/hr</a>	HT85562	355 bhp, <a href="#">150 kW, 2.5e6 btu/hr</a>
299	Diesel Fire Pump Packaged System, <a href="#">2500 gpm</a> , diesel fueled	John Deere <a href="#">Diesel Engine; 1.5E6 BTU/HR</a>	6068	240 bhp, <a href="#">1.5e6 btu/hr, 2500 gpm H2O</a>
<del>300</del>	<del>Solvent Cleaner</del>	<del>System One</del>	<del>570</del>	<del>35 gallons</del>
<del>301</del>	<del>Solvent Cleaner</del>	<del>System One</del>	<del>570</del>	<del>35 gallons</del>
<del>302</del>	<del>Solvent Cleaner</del>	<del>System One</del>	<del>570</del>	<del>35 gallons</del>
<del>303</del>	<del>Solvent Cleaner</del>	<del>System One</del>	<del>570</del>	<del>35 gallons</del>
<del>304</del>	<del>Solvent Cleaner</del>	<del>System One</del>	<del>570</del>	<del>35 gallons</del>
305	<del>Cold Cleaner</del> <del>Solvent Cleaner</del>	System One	570	35 gallons
<del>306</del>	<del>Solvent Cleaner</del>	<del>System One</del>	<del>570</del>	<del>35 gallons</del>
<del>307</del>	<del>Solvent Cleaner</del>	<del>System One</del>	<del>570</del>	<del>35 gallons</del>
<del>308</del>	<del>Cold Cleaner</del> <del>Solvent Cleaner</del>	System One	570	35 gallons
<del>309</del>	<del>Solvent Cleaner</del>	<del>System One</del>	<del>570</del>	<del>35 gallons</del>
<del>310</del>	<del>Solvent Cleaner</del>	<del>System One</del>	<del>570</del>	<del>35 gallons</del>
<del>311</del>	<del>Cold Cleaner</del> <del>Solvent Cleaner</del>	System One	570	35 gallons
<del>312</del>	<del>Solvent Cleaner</del>	<del>Zep</del>	<del>9066</del>	<del>45 gallons</del>
<del>317</del>	<del>Cold Cleaner</del>	<del>Inland Technology</del>	<del>IT48WC</del>	<del>42 gallons</del>

**Table II A - Permitted Sources**

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
400	S400 Contaminated Soils (SWMUs) – “S-Out”	Contaminated soil in Custom Solid Waste Management Units (landfills)	Not applicable	<del>Approximately 100,000 cubic yards to be removed</del> 400 tons/hr
<del>401</del>	<del>S401 Contaminated Soils (CAMU) – “In”</del>	<del>Contaminated soil to Custom Corrective Action Management Unit (landfill)</del>	<del>Not applicable</del>	<del>Approximately 100,000 cubic yards to be added</del>
402	<u>Horizontal Electrostatic Coil Oiler</u>	<u>Peabody</u>	<u>HO LBO 609</u>	<u>36,500 gallons of Steel Shield 6299 coating oil</u>

**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
21	TWTP-Lime Handling-Dust Collector	S134	<u>BAAQMD Regulation 6-1-301</u>	<u>Pressure Drop 0.5 to 7.0 inches water</u> Allowable pressure drop range to be determined	Ringelmann 1 for < 3 minutes/hr
			<u>BAAQMD Regulation 6-1-310</u>	<u>Pressure Drop 0.5 to 7.0 inches water</u> Allowable pressure drop range to be determined	0.15 gr/dscf
			<u>BAAQMD Regulation 6-1-311</u>	<u>Pressure Drop 0.5 to 7.0 inches water</u> Allowable pressure drop range to be determined	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr

**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
24	<u>Tin Free Steel Cell-Fume Scrubber</u>	<u>S-155</u>	<u>BAAQMD Regulation 6-1-301</u> <del>6-301</del>	<u>Pressure Drop 0.1 to 4.2 inches water</u> <del>Allowable pressure drop range to be determined</del>	<u>Ringelmann 1 for &lt; 3 minutes/hr</u>
26	Pickling Line Baghouse	S166, S167, S168	<u>BAAQMD Regulation 6-1-301</u> <del>6-301</del>	<u>Pressure Drop 1.0 to 10.0 inches water</u> <del>Allowable pressure drop range to be determined</del>	Ringelmann 1 for < 3 minutes/hr
			<u>BAAQMD Regulation 6-1-310</u> <del>6-310</del>	<u>Pressure Drop 1.0 to 10.0 inches water</u> <del>Allowable pressure drop range to be determined</del>	0.15 gr/dscf
			<u>BAAQMD Regulation 6-1-311</u> <del>6-311</del>	<u>Pressure Drop 1.0 to 10.0 inches water</u> <del>Allowable pressure drop range to be determined</del>	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr
			BAAQMD Condition #7216, part B. 1	<u>Pressure Drop 1.0 to 10.0 inches water</u> <del>Allowable pressure drop range to be determined</del>	0.670 lb PM10/hr
27	Pickling Line Scrubber	S169 and exempt sources	None	<u>Pressure Drop 0.1 to 2.5 inches water;</u> <u>Liquid Flow Rate 300 to 450 gallons/min</u> <del>Allowable pressure drop range to be determined</del>	None
28	Pickling Line Mist Eliminator	S169 and exempt sources via A27	<u>BAAQMD Regulation 6-1-301</u> <del>6-301</del>	<u>Pressure Drop 0.1 to 2.5 inches water</u> <del>Allowable pressure drop range to be determined</del>	Ringelmann 1 for < 3 minutes/hr

**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
			<u>BAAQMD Regulation 6-1-310</u> <del>6-310</del>	<u>Pressure Drop 0.1 to 2.5 inches water</u> <del>Allowable pressure drop range to be determined</del>	0.15 gr/dscf
			<u>BAAQMD Regulation 6-1-311</u> <del>6-311</del>	<u>Pressure Drop 0.1 to 2.5 inches water</u> <del>Allowable pressure drop range to be determined</del>	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr
28	Pickling Line Mist Eliminator		BAAQMD Condition #7216, part C. 3	<u>Pressure Drop 0.1 to 2.5 inches water</u> <del>Allowable pressure drop range to be determined</del>	0.506 lb PM10/hr and 30 ppmv HCl
			BAAQMD Condition #7216, part J. 1	<u>Pressure Drop 0.1 to 2.5 inches water</u> <del>Allowable pressure drop range to be determined</del>	Not to exceed 9 tpy HCl facility-wide
29	Tandem Cold Mill Mist Eliminator	S171	<u>BAAQMD Regulation 6-1-301</u> <del>6-301</del>	<u>Pressure Drop 1.0 to 10.0 inches water</u> <del>Allowable inlet pressure range to be determined</del>	Ringelmann 1 for < 3 minutes/hr
			<u>BAAQMD Regulation 6-1-310</u> <del>6-310</del>	<u>Pressure Drop 1.0 to 10.0 inches water</u> <del>Allowable inlet pressure range to be determined</del>	0.15 gr/dscf
			<u>BAAQMD Regulation 6-1-311</u> <del>6-311</del>	<u>Pressure Drop 1.0 to 10.0 inches water</u> <del>Allowable inlet pressure range to be determined</del>	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr

**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
			BAAQMD Condition #7216, part D. 4	<u>Pressure Drop 1.0 to 10.0 inches water</u> <del>Allowable inlet pressure range to be determined</del>	1.642 lb PM10/hr and 2.42 lb POC/hr
30	HCD Scrubber	S173	<u>BAAQMD Regulation 6-1-301</u> <del>Regulation 6-301</del>	<u>Pressure Drop 0.1 to 7 inches water; Liquid Flow Rate 10 to 50 gallons per minute</u> <del>Allowable pressure drop range to be determined</del>	Ringelmann 1 for < 3 minutes/hr
			<u>BAAQMD Regulation 6-1-310</u> <del>Regulation 6-310</del>	<u>Pressure Drop 0.1 to 7 inches water; Liquid Flow Rate 10 to 50 gallons per minute</u> <del>Allowable pressure drop range to be determined</del>	0.15 gr/dscf
			<u>BAAQMD Regulation 6-1-311</u> <del>Regulation 6-311</del>	<u>Pressure Drop 0.1 to 7 inches water; Liquid Flow Rate 10 to 50 gallons per minute</u> <del>Allowable pressure drop range to be determined</del>	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr
			BAAQMD Condition #7216, part E. 1	<u>Pressure Drop 0.1 to 7 inches water; Liquid Flow Rate 10 to 50 gallons per minute</u> <del>Allowable pressure drop range to be determined</del>	0.035 lb PM10/hr
32	NOx Catalytic Reduction Unit	S174	BAAQMD Condition #7216, part F. 1	None	100 lb/day NOx from S174 plus S177

**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
			BAAQMD Condition #7216, part F. 4	None	≤ 10 ppmv NOx @ 3% O2 or ≥ 90 % NOx reduction by wt or ≥ 82% % NOx reduction by wt @ heat input level < \$50 kscf/hr or < 18 ppmv NOx @ 3% O2 @ heat input level < 50 kscf/hr thin gauge coil
33	Roll Etch Dust Collector	S176	<u>BAAQMD Regulation 6-1-301</u> <del>Regulation 6-301</del>	<u>Pressure Drop 0.5 to 2 inches water</u> <del>Allowable pressure drop range to be determined</del>	Ringelmann 1 for < 3 minutes/hr
			<u>BAAQMD Regulation 6-1-310</u> <del>Regulation 6-310</del>	<u>Pressure Drop 0.5 to 2 inches water</u> <del>Allowable pressure drop range to be determined</del>	0.15 gr/dscf
			<u>BAAQMD Regulation 6-1-311</u> <del>Regulation 6-311</del>	<u>Pressure Drop 0.5 to 2 inches water</u> <del>Allowable pressure drop range to be determined</del>	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr
			BAAQMD Condition #7216, part H. 42	<u>Pressure Drop 0.5 to 2 inches water</u> <del>Allowable pressure drop range to be determined</del>	0.01 gr PM10/dscf

**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
34	Venturi Scrubber	<del>S177 via A36 and A37, S178, S179, and S182 via A35 and A38, S180 via S181 S177, S178, S179, S180, S181, and S182</del>	None	<del>Pressure Drop 6.0 to 25.0 inches water; Liquid Flow Rate 500 to 1000 gallons per minute Allowable pressure drop range to be determined</del>	None
35	Silo #2 Baghouse	<del>S178, S179, S182</del>	None	<del>Pressure Drop 1.0 to 4.0 inches water Allowable pressure drop range to be determined</del>	None
36	Hot Gas Cyclone #1	S177	None	None	None
37	Hot Gas Cyclone #2	S177	None	None	None
38	Silo #1 Baghouse	<del>S178, S179, S182</del>	None	<del>Pressure Drop 1.0 to 4.0 inches water Allowable pressure drop range to be determined</del>	None
39	Venturi Recuperator	S177 via A36, A37	None	None	None



**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
40	Iron Oxide/HCl Plant Demister	<u>S177, S178, S179, S180, S181, and S182</u> via A36 and A37, S178, S179, and S182 via A35 and A38, S180 via S181, all via A34	<u>BAAQMD Regulation 6-1-301</u> 6-301	<u>Pressure Drop 0.0 to 2.0 inches water</u> Allowable pressure drop range to be determined	Ringelmann 1 for < 3 minutes/hr
			<u>BAAQMD Regulation 6-1-310</u> 6-310	<u>Pressure Drop 0.0 to 2.0 inches water</u> Allowable pressure drop range to be determined	0.15 gr/dscf
			<u>BAAQMD Regulation 6-1-311</u> 6-311	<u>Pressure Drop 0.0 to 2.0 inches water</u> Allowable pressure drop range to be determined	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr
			BAAQMD Condition #7216, part G. 5	<u>Pressure Drop 0.0 to 2.0 inches water</u> Allowable pressure drop range to be determined	2 ppmv HCl
			BAAQMD Condition #7216, part G. 10	<u>Pressure Drop 0.0 to 2.0 inches water</u> Allowable pressure drop range to be determined	0.46 lb PM10/hr

**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
40	Iron Oxide/HCl Plant Demister		BAAQMD Condition #7216, part J. 1	<u>Pressure Drop 0.0 to 2.0 inches water</u> <del>Allowable pressure drop range to be determined</del>	Not to exceed 9 tpy HCl facility-wide
41	ETL Enforcer III Scrubber #1	S82, S155	<u>BAAQMD Regulation 6-1-301</u> <del>Regulation 6-301</del>	<u>Pressure Drop 0.1 to 4.2 inches water</u> <del>Allowable pressure drop range to be determined</del>	Ringelmann 1 for < 3 minutes/hr
			<u>BAAQMD Regulation 6-1-310</u> <del>Regulation 6-310</del>	<u>Pressure Drop 0.1 to 4.2 inches water</u> <del>Allowable pressure drop range to be determined</del>	0.15 gr/dscf
			<u>BAAQMD Regulation 6-1-311</u> <del>Regulation 6-311</del>	<u>Pressure Drop 0.1 to 4.2 inches water</u> <del>Allowable pressure drop range to be determined</del>	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr
			Regulation 11, Rule 8, Section 93102.4, part (a)(1)(C) (2)	<u>Pressure Drop 0.1 to 4.2 inches water</u> <del>Allowable pressure drop range to be determined</del>	≤ 0.01 mg of hexavalent chromium per dscm ( <u>4.4e-6 gr/dscf</u> )
			BAAQMD Condition #7579, part 1	<u>Pressure Drop 0.1 to 4.2 inches water</u> <del>Allowable pressure drop range to be determined</del>	≤ 0.00156 mg of hexavalent chromium per amp-hr
42	ETL Enforcer III Scrubber #2	S93	<u>BAAQMD Regulation 6-1-301</u> <del>Regulation 6-301</del>	<u>Pressure Drop 1.75 to 5.75 inches water</u> <del>Allowable pressure drop range to be determined</del>	Ringelmann 1 for < 3 minutes/hr

**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
			<u>BAAQMD Regulation 6-1-310</u> <del>6-310</del>	<u>Pressure Drop 1.75 to 5.75 inches water</u> <del>Allowable pressure drop range to be determined</del>	0.15 gr/dscf
			<u>BAAQMD Regulation 6-1-311</u> <del>6-311</del>	<u>Pressure Drop 1.75 to 5.75 inches water</u> <del>Allowable pressure drop range to be determined</del>	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr
			Regulation 11, Rule 8, Section 93102.4, part (a)(1)(Ce) (2)	<u>Pressure Drop 1.75 to 5.75 inches water</u> <del>Allowable pressure drop range to be determined</del>	≤ 0.01 mg of hexavalent chromium per dscm ( <u>4.4e-6 gr/dscf</u> )
42	<u>ETL Enforcer III Scrubber #2</u>		BAAQMD Condition #7579, part <u>1a3</u>	<u>Pressure Drop 1.75 to 5.75 inches water</u> <del>Allowable pressure drop range to be determined</del>	≤ 0.00 <u>156</u> mg of hexavalent chromium per amp-hr
43	#1 CRU Evaporator Mist Eliminator	S286	<u>BAAQMD Regulation 6-1-301</u> <del>6-301</del>	Allowable pressure drop range to be determined	Ringelmann 1 for < 3 minutes/hr
			<u>BAAQMD Regulation 6-1-310</u> <del>6-310</del>	Allowable pressure drop range to be determined	0.15 gr/dscf
			<u>BAAQMD Regulation 6-1-311</u> <del>6-311</del>	Allowable pressure drop range to be determined	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr

**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
			BAAQMD Condition #12194, part 1	Allowable pressure drop range to be determined	≤ 0.87 lb of hexavalent chromium per year from this source and S287
44	#2 CRU Evaporator mist Eliminator	S287	<u>BAAQMD Regulation 6-1- 301Regulation 6-301</u>	Allowable pressure drop range to be determined	Ringelmann 1 for < 3 minutes/hr
			<u>BAAQMD Regulation 6-1- 310Regulation 6-310</u>	Allowable pressure drop range to be determined	0.15 gr/dscf
			<u>BAAQMD Regulation 6-1- 311Regulation 6-311</u>	Allowable pressure drop range to be determined	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr
			BAAQMD Condition #12194, part 1	Allowable pressure drop range to be determined	≤ 0.87 lb of hexavalent chromium per year from this source and S286
45	Dust Collector	S96, S97	<u>BAAQMD Regulation 6-1- 301Regulation 6-301</u>	<del>Allowable pressure drop range to be determined</del> <u>Pressure Drop 0.5 to 2.5 inches water</u>	Ringelmann 1 for < 3 minutes/hr
45	<del>Dust Collector</del>		<u>BAAQMD Regulation 6-1- 310Regulation 6-310</u>	<u>Pressure Drop 0.5 to 2.5 inches water</u> <del>Allowable pressure drop range to be determined</del>	0.15 gr/dscf

**Table II B – Abatement Devices**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
			<del>BAAQMD Regulation 6-1-311 Regulation 6-311</del>	<del>Pressure Drop 0.5 to 2.5 inches water Allowable pressure drop range to be determined</del>	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr
46	Oil Mist Precipitator	S292	BAAQMD 8-11-304	<del>Allowable DC milliamps and DC kilovolts ranges to be determined</del> Current between 0.4 to 2.0 mA; Voltage 5.0 to 13.0 kV	Abatement to no more than 1.0 lb VOC/gal and abatement device efficiency of at least 90% if VOC of coating > 1.7 lb/gal
			BAAQMD Condition #16682, part 3	<del>Current between 0.4 to 2.0 mA; Voltage 5.0 to 13.0 kV; Allowable DC milliamps and DC kilovolts ranges to be determined</del>	≤ 0.05 lb VOC/gal of coating applied

Per BAAQMD Regulation 2-1-403, operating parameters are established by UPI in Table II B to ensure proper operation of abatement devices. Allowable pressure drop have not been determined for A43 and A44 because UPI have not run them yet.

**III. Generally Applicable Requirements**

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in Sections IV and VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound) are placed in this section.

Unpermitted sources are exempt from normal District permits pursuant to an exemption in BAAQMD Regulation 2, Rule 1. They may, however, be specifically described in a Title V

permit if they are considered significant sources pursuant to the definition in BAAQMD Rule 2-6-239.

### Changes to permit

Section III has been modified to say that SIP standards are now found on the EPA website and are not included as part of the permit.

Table III has been updated by adding the following rules and standards to conform to current practice:

- SIP Regulation 2, Rule 1, General Requirements
- SIP 2-1-429, Federal Emissions Statement
- BAAQMD Regulation 2, Rule 5, New Source Review of Toxic Air Contaminants
- BAAQMD Regulation 6, Particulate Matter and Visible Emissions has been designated as SIP Regulation 6, since the rule has been renamed and renumbered as Regulation 6, Rule 1, Particulate Matter, General Provisions
- SIP Regulation 8, Rule 2, Organic Compounds - Miscellaneous Operations
- BAAQMD Regulation 8, Rule 40 Aeration of Contaminated Soil and Removal of Underground Storage Tanks
- BAAQMD Regulation 8, Rule 47, Air Stripping and Soil Vapor Extraction Operations
- California Health and Safety Code Section 41750 et seq., Portable Equipment
- California Health and Safety Code Title 17, Subchapter 10, Article 2, Section 95100 through 95109, Mandatory Greenhouse Gas Emissions Reporting
- California Health and Safety Code Section 93115 et seq., Airborne Toxic Control Measure for Stationary Compression Ignition Engines
- California Health and Safety Code Section 93116 et seq., Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Rated at 50 Horsepower and Greater
- EPA Regulation 40 CFR Part 98, Mandatory Greenhouse Gas Reporting

The dates of adoption or approval of the rules and their “federal enforceability” status in Table III have also been updated.

#### **IV. Source-Specific Applicable Requirements**

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules
- SIP Rules (if any) are listed following the corresponding District rules. SIP rules are District rules that have been approved by EPA for inclusion in the California State Implementation Plan. SIP rules are “federally enforceable” and a “Y” (yes) indication will appear in the “Federally Enforceable” column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the “Federally Enforceable” column will have a “Y” for “yes”. If the SIP rule is not the current District rule, the SIP rule or the necessary portion of

the SIP rule is cited separately after the District rule. The SIP portion will be federally enforceable; the non-SIP version will not be federally enforceable, unless EPA has approved it through another program.

- Other District requirements, such as the Manual of Procedures, as appropriate.
- Federal requirements (other than SIP provisions)
- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
- Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit.

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District or EPA websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV. Section VII is a cross-reference between the limits and monitoring requirements. A discussion of monitoring is included in Section C.VII of this permit evaluation/statement of basis.

### ***Complex Applicability Determinations***

#### Compliance Assurance Monitoring:

The Compliance Assurance Monitoring (CAM) regulation in 40 CFR, Part 64 was developed to provide assurance that facilities comply with applicable emissions limitations by adequately monitoring control devices. The CAM rule became effective on November 21, 1997. However, most facilities are not affected by CAM requirements until they submit applications for Title V permit renewal.

CAM applies to a source of criteria pollutant or hazardous air pollutant (HAP) emissions if all the following requirements are met:

- The source is located at a major source for which a Title V permit is required; and
- The source is subject to a federally enforceable emission limitation or standard for a criteria pollutant or HAP; and
- The source uses a control device to comply with the federally enforceable emission limitation or standard; and
- The source has potential pre-control emissions of the regulated pollutant that are equal to or greater than the major source threshold for the pollutant (in BAAQMD, the major source thresholds are 100 tons per year for each criteria pollutant, 10 tons per year for a single HAP, and 25 tons per year for two or more HAPs); and
- The source is not otherwise exempt from CAM.

The applicability of CAM was reviewed for the sources at this facility. The detailed CAM Applicability Analysis (Attachment 1) and the Potential to Emit (PTE) Calculations (Attachment 2) are in Appendix B.

After calculating the PTE for abated sources, it was determined that three sources are subject to CAM. Condition # 25311 was created to impose the monitoring requirements on all affected sources. The table below lists the sources that are subject to CAM and their associated abatement devices.

Source No. (S-)	Source Description	Abatement Device
178	Iron Oxide, Silo #1	A-34 Venturi Scrubber, A-35 Silo #2 Baghouse, A-38 Silo #1 Baghouse, A-40 Iron Oxide/HCL Plant Demister
179	Iron Oxide Bagging Station	A-34 Venturi Scrubber, A-35 Silo #2 Baghouse, A-38 Silo #1 Baghouse, A-40 Iron Oxide/HCL Plant Demister
182	Iron Oxide, Silo #2	A-34 Venturi Scrubber, A-35 Silo #2 Baghouse, A-38 Silo #1 Baghouse and A-40 Iron Oxide/HCL Plant Demister

Based upon the emissions calculations, the post-control device emissions of PM for S-178, S-179, and S-182 are each less than 100 tons per year.

Therefore, pursuant to 40 CFR 64.3(b)(4)(iii), the minimum frequency of data collection is at least once per 24-hr period. The permit conditions for S-178, S-179, and S-182 require that the baghouse pressure drop and scrubber liquid flow rate be monitored at least once per day.

NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE):

The existing stationary RICE S-293, S-294, S-295, S-296, S-297, and S-299 are subject to the Code of Federal Regulation, Title 40, Part 63, subpart ZZZZ – NESHAP for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Per 40 CFR 63.6590(a)(1)(iii), the subpart ZZZZ applies to existing stationary RICE located at an area source of HAP emissions. The listed engines are considered “existing” because the construction or reconstruction was commenced before 6/12/06. Therefore, the engines are subject to Subpart ZZZZ.

112 (j) Case By Case MACT: This requirement does not apply because the USS-POSCO facility does not have the potential to emit more than 10 tons of a single HAP or 25 tons of any combination of HAPs. Therefore, it is not a major facility for HAPs.

Changes to permit:

Section IV has been modified to say that SIP standards can be found on the EPA website and are not included as part of the permit.



The District amended BAAQMD Regulation 6, Rule 1 on 12/5/07 so the amended rule is added and the previous entry is made the SIP approved version with an EPA approval date of 9/4/98. This proposed change is the only change made in Section IV for:

S43 and S70	S65	S72
S80 and S91	S82, S93 and S155	S97 and S134
S166, S167 and S168	S169	S171
S173	S174	S176
S177	S178, S179 and S182	S180, S181
S286 and S287	S293 through S297	S299
S400		

Only the change in Table IV – A is shown since it is typical for all listed above.

Following are the proposed changes in Section IV for S43 and S70:

**Table IV - A**  
**Source-specific Applicable Requirements**  
**S43 - #1 CONTINUOUS ANNEALING LINE - ANNEALING FURNACE**  
**S70 - ANNEALING FURNACE**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter – General Requirements</b> <del>Particulate Matter and Visible Emissions (7/11/90)</del> <u>(12/05/07)</u>		
6- <del>1</del> -301	Ringelmann No. 1 Limitation	<del>Y</del> N	
6- <del>1</del> -305	Visible Particles	<del>N</del> Y	
6- <del>1</del> -310	Particulate Weight Limitation	N	
6- <del>1</del> -310.3	Particulate Weight Limitation, Heat Transfer Operation	<del>N</del> Y	
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (9/4/98)</b>		
<u>6-301</u>	<u>Ringelmann No. 1 Limitation</u>	<u>Y</u>	
<u>6-305</u>	<u>Visible Particles</u>	<u>Y</u>	
<u>6-311</u>	<u>General Operations</u>	<u>Y</u>	
<u>6-401</u>	<u>Appearance of Emissions</u>	<u>Y</u>	
<b>BAAQMD Regulation 9, Rule 1</b>	<b>Sulfur Dioxide (3/15/95)</b>		
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-302	General Emission Limitation	Y	

Following are the proposed changes in Section IV for S82, S93, and S155:

**Table IV - E**  
**Source-specific Applicable Requirements**  
**S82 - #1 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S93 - #3 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S155 - NO. 1 ELECTRO-TINNING (TIN FREE STEEL CELL)**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 6, Rule 1</b>	<b>Particulate Matter – General Requirements Particulate Matter and Visible Emissions (7/11/90)(12/05/07)</b>		
6-1-301	Ringelmann No. 1 Limitation	<del>N</del>	
6-1-305	Visible Particles	<del>N</del>	
6-1-310	Particulate Weight Limitation	<del>N</del>	
6-1-311	General Operations	<del>N</del>	
6-1-401	Appearance of Emissions	<del>N</del>	
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (9/4/98)</b>		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
6-401	Appearance of Emissions	Y	
<b>BAAQMD Regulation 11, Rule 8</b>	<b>Hazardous Pollutants – Hexavalent Chromium Airborne Toxic Control Measure for Chrome Plating and Chromic Acid Anodizing Operations (11/4/98) – Adoption of Section 93102, Subchapter 7.5, Chapter 1, Division 3, Title 17 of the California Code of Regulations</b>		
93102(a)	Applicability		
93102(a)(1)	Regulation applies to decorative chromium electroplating	Y	
93102(a)(4)	Breakdown relief possible	Y	
93102(c)	Standards		
93102(c)(2)	Decorative Chrome Electroplating and Chromic Acid Anodizing Facilities, Emission Limits or Use of fume suppressant with wetting agent	Y	
93102(e)	Parameter Monitoring		
93102(e)(1)	Ampere-hour Meters	Y	
93102(e)(2)	Pressure Drop Monitoring for Add-on Control Device	Y	
93102(f)	Inspection and Maintenance Requirements		

**Table IV - E**  
**Source-specific Applicable Requirements**  
**S82 - #1 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S93 - #3 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S155 - No. 1 ELECTRO-TINNING (TIN FREE STEEL CELL)**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
93102(f)(1)	Table (f)(1) Summary of Inspection and Maintenance Requirements for Sources Using Add-on Air Pollution Control Devices	Y	
93102(g)	Operation and Maintenance Plan Requirements		
93102(g)(1)	Prepare O&M Plan	Y	
93102(g)(1)(A)	Standardized Checklist	Y	
93102(g)(1)(B)	Maintenance Procedures	Y	
93102(g)(2)	Retain O&M Plan On Site	Y	
93102(g)(3)	Changes to the O&M Plan	Y	
93102(g)(4)	Revisions to Address Breakdowns	Y	
93102(h)	Recordkeeping		
93102(h)(1)	Air Pollution Control Device Inspection Records	Y	
93102(h)(3)	Performance Test Records	Y	
93102(h)(4)	Monitoring Data Records	Y	
93102(h)(5)	Breakdown Records	Y	
93102(h)(6)	Records of Excesses	Y	
93102(h)(11)	Records Retention	Y	
93102(i)	Reporting		
93102(i)(1)	Performance Test Documentation		
93102(i)(3)	Ongoing Compliance Status Reports	Y	
93102(i)(4)	Reports of Breakdowns	Y	
<b>BAAQMD Condition #7579</b>			
part 1	<del>Annual Amp-hr Limitation (Basis: Voluntary)</del> <u>Performance Standards (Basis: ATCM 93102.2 (b))</u>	Y	
part 2	Abatement Requirement (Basis: Regulation 11-8-93102(c)(2))	Y	
part 3	<del>Hexavalent Chromium Emission Limit (Basis: Regulation 11-8-93102(e)(2))</del> <u>Source Test (Basis: 93102.7)</u>	Y	
part 4	<del>Source testing protocol (Basis: Regulation 11-8-93102(d)(4))</del> <u>Training (Basis: 93102.5(b))</u>	Y	

**Table IV - E**  
**Source-specific Applicable Requirements**  
**S82 - #1 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S93 - #3 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S155 - No. 1 ELECTRO-TINNING (TIN FREE STEEL CELL)**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
part 5	<u>Record keeping (Basis: Regulation 11 8 93102(h)(4)(A))Housekeeping (Basis: 93102.5(c))</u>	Y	
part 6	<u>Source Test Requirement Every Two Years (Basis: Regulation 2 1-304)Monitoring (Basis: 93102.9, 93102.10, 93102.12)</u>	Y	
<u>part 7</u>	<u>Operation and Maintenance Plan (Basis: 93012.11)</u>	<u>Y</u>	
<u>part 8</u>	<u>Inspection &amp; Maintenance Frequency (Basis: 93102.10(a) and Reg 2-5)</u>	<u>Y</u>	
<u>part 9</u>	<u>Recordkeeping (Basis: 93102.12)</u>	<u>Y</u>	
<u>part 10</u>	<u>Reporting requirements (Basis: 93102.13)</u>	<u>Y</u>	

Condition 7579 is modified through AN 19114 in response to revision to ATCM for Chromium Plating and Chromic Acid Anodizing effective on 10/24/07. See appendix for AN 19114 for more explanation.

Following are the proposed changes in Section IV for S130 and S133:

**Table IV - G**  
**Source-specific Applicable Requirements**  
**S130 - OIL SEPARATION UNIT AND**  
**S133 - TERMINAL WATER TREATMENT PLANT**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8, Rule 8</b>	<b>Organic Compounds – Wastewater (Oil-Water) Separators (96/15/0494)</b>		
8-8-112	Exemption, Wastewater Critical OC Concentration and/or Temperature	<del>Y</del>	
8-8-502	Wastewater sample and test requirements	<del>Y</del>	
<b><u>SIP Regulation 8, Rule 8</u></b>	<b><u>Organic Compounds – Wastewater (Oil-Water) Separators (8/29/94)</u></b>		
<u>8-8-112</u>	<u>Exemption, Wastewater Critical OC Concentration and/or Temperature</u>	<u>Y</u>	
<u>8-8-502</u>	<u>Wastewater sample and test requirements</u>	<u>Y</u>	

The BAAQMD amended BAAQMD Regulation 8, Rule 8 on 9/15/04 so the amended rule is added and the previous entry is made the SIP approved version with an EPA approval date of 8/29/94.

Following are the proposed changes in Section IV for S149:

**Table IV - H**  
**Source-specific Applicable Requirements**  
**S149 - PAINT SHOP SPRAY BOOTH**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8, Rule 19</b>	<b>Surface Coating of Miscellaneous Metal Parts and Products (10/16/02)</b>		
8-19-302	Limits		
8-19-302.2	Air-Dried Coatings	Y	
8-19-307	Prohibition of Specification	Y	
8-19-312	Specialty Coating Limitations		
8-19-312.2	High Gloss	Y	
8-19-312.3	Heat Resistant	Y	
8-19-312.4	High Performance Architectural	Y	
8-19-312.5	Metallic Topcoat	Y	
8-19-312.7	Pretreatment Wash Primer	Y	
8-19-312.8	Silicone Release	Y	
8-19-312.9	Solar Absorbant	Y	
8-19-312.12	Extreme Performance	Y	
8-19-312.13	High Temperature	Y	
8-19-313	Spray Applications Equipment Limitations	Y	
8-19-320	Solvent Evaporative Loss Minimization	Y	
8-19-321	Surface Preparation Standards	Y	
8-19-501	Records	Y	
<b>SIP BAAQMD Regulation 8, Rule 19</b>	<b>Surface Coating of Miscellaneous Metal Parts and Products (12/20/95)</b>		
<del>8-19-302</del>	<del>Limits</del>		
<del>8-19-302.2</del>	<del>Air Dried Coatings</del>	<del>Y</del>	
<del>8-19-307</del>	<del>Prohibition of Specification</del>	<del>Y</del>	
<del>8-19-312</del>	<del>Specialty Coating Limitations</del>		

**Table IV - H**  
**Source-specific Applicable Requirements**  
**S149 - PAINT SHOP SPRAY BOOTH**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
<a href="#">8-19-312.2</a>	<a href="#">High-Gloss</a>	Y	
<a href="#">8-19-312.3</a>	<a href="#">Heat-Resistant</a>	Y	
<a href="#">8-19-312.4</a>	<a href="#">High-Performance Architectural</a>	Y	
<a href="#">8-19-312.5</a>	<a href="#">Metallic Topcoat</a>	Y	
<a href="#">8-19-312.7</a>	<a href="#">Pretreatment Wash Primer</a>	Y	
<a href="#">8-19-312.8</a>	<a href="#">Silicone Release</a>	Y	
<a href="#">8-19-312.9</a>	<a href="#">Solar Absorbant</a>	Y	
<a href="#">8-19-312.12</a>	<a href="#">Extreme Performance</a>	Y	
<a href="#">8-19-312.13</a>	<a href="#">High Temperature</a>	Y	
<a href="#">8-19-313</a>	<a href="#">Spray Applications Equipment Limitations</a>	Y	
<a href="#">8-19-320</a>	<a href="#">Solvent Evaporative Loss Minimization</a>	Y	
<a href="#">8-19-501</a>	<a href="#">Records</a>	Y	
<b><a href="#">BAAQMD Regulation 8, Rule 32</a></b>	<b><a href="#">Wood Products Coating (8/5/09)</a></b>		
<a href="#">8-32-301</a>	<a href="#">Spray Application Equipment Limitations</a>	N	
<a href="#">8-32-302</a>	<a href="#">General Wood Product Limits</a>	N	
<a href="#">8-32-303</a>	<a href="#">Furniture, Custom Cabinetry and Custom Architectural Millwork Limits</a>	N	
<a href="#">8-32-304</a>	<a href="#">Custom and Contract Furniture Limits</a>	N	
<a href="#">8-32-320</a>	<a href="#">Solvent Evaporative Loss Minimization</a>	N	
<a href="#">8-32-501</a>	<a href="#">Recordkeeping Requirements</a>	N	
<b><a href="#">SIP BAAQMD Regulation 8, Rule 32</a></b>	<b><a href="#">Wood Products Coating (12/31/97)</a></b>		
<a href="#">8-32-301</a>	<a href="#">Spray Application Equipment Limitations</a>	Y	
<a href="#">8-32-303</a>	<a href="#">General Wood Product Limits</a>	Y	
<a href="#">8-32-304</a>	<a href="#">Furniture and Custom Architectural Millwork Limits</a>	Y	
<a href="#">8-32-320</a>	<a href="#">Solvent Evaporative Loss Minimization</a>	Y	
<a href="#">8-32-501</a>	<a href="#">Recordkeeping Requirements</a>	Y	
<b><a href="#">BAAQMD Regulation 8, Rule 45</a></b>	<b><a href="#">Motor Vehicle and Mobile Equipment Coating Operations (12/3/08)</a></b>		
<a href="#">8-45-301</a>	<a href="#">Limits</a>	N	
<a href="#">8-45-303</a>	<a href="#">Transfer Efficiency</a>	N	

**Table IV - H**  
**Source-specific Applicable Requirements**  
**S149 - PAINT SHOP SPRAY BOOTH**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<a href="#">8-45-308</a>	<a href="#">Surface Preparation and Solvent Loss Minimization</a>	<u>N</u>	
<a href="#">8-45-501</a>	<a href="#">Coating Records</a>	<u>N</u>	
<b>SIP</b> <b>BAAQMD</b> <b>Regulation 8,</b> <b>Rule 45</b>	<b><a href="#">Motor Vehicle and Mobile Equipment Coating Operations (5/26/00)</a></b>		
<a href="#">8-45-301</a>	<a href="#">Limits</a>	<u>Y</u>	
<a href="#">8-45-303</a>	<a href="#">Transfer Efficiency</a>	<u>Y</u>	
<a href="#">8-45-308</a>	<a href="#">Surface Preparation and Solvent Loss Minimization</a>	<u>Y</u>	
<a href="#">8-45-501</a>	<a href="#">Coating Records</a>	<u>Y</u>	

The SIP approved version of Regulation 8, rule 19 is the current rule so the SIP entry is deleted. Also, applicable requirements are added for BAAQMD Reg 8-32 and Reg 8-45 since coatings subject to those rules could be applied.

Following are the proposed changes in Section IV for S158:

**Table IV - I**  
**Source-specific Applicable Requirements**  
**S158 - GASOLINE DISPENSING ISLAND**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>SIP</b> <b>BAAQMD</b> <b>Regulation 8,</b> <b>Rule 7</b>	<b><a href="#">Organic Compounds, Gasoline Dispensing Facilities (11/6/02)</a></b>		
8-7-113	Tank Gauging and Inspection Exemption	Y	
8-7-114	Stationary Tank Testing Exemption	Y	
8-7-301	Phase I Requirements		
8-7-301.1	Requirements for Transfers into Stationary Tanks, Cargo Tanks, and Mobile Refuelers	Y	
8-7-301.2	CARB Certification Requirements	Y	
8-7-301.3	Submerged Fill Pipe Requirement	Y	
8-7-301.5	Maintenance and Operating Requirement	Y	

**Table IV - I**  
**Source-specific Applicable Requirements**  
**S158 - GASOLINE DISPENSING ISLAND**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
8-7-301.6	Leak-Free and Vapor Tight Requirement for Components	Y	
8-7-301.7	Fitting Requirements for Vapor Return Line	Y	
8-7-301.8	Coaxial Phase I Systems Certified by CARB prior to January 1, 1994 may not be installed on New or Modified Systems	Y	
8-7-301.9	Anti-rotational Coupler or Swivel Adapter Required	Y	
8-7-301.10	Vapor Recovery Efficiency Requirements for New and Modified Systems	Y	
8-7-301.11	CARB-certified Spill Box Required	Y	
8-7-301.12	Spill Box Drain Valve Limitation	Y	
8-7-301.13	Annual Vapor Tightness Test Requirement	Y	
<del>8-7-302</del>	<del>Phase II Requirements</del>		
<del>8-7-302.1</del>	<del>Requirements for Transfers into Motor Vehicle Fuel Tanks</del>	<del>Y</del>	
<del>8-7-302.2</del>	<del>Maintenance Requirement</del>	<del>Y</del>	
<del>8-7-302.3</del>	<del>Proper Operation and Free of Defects Requirements</del>	<del>Y</del>	
<del>8-7-302.4</del>	<del>Repair Time Limit for Defective Components</del>	<del>Y</del>	
<del>8-7-302.5</del>	<del>Leak-Free and Vapor Tight Requirement for Components</del>	<del>Y</del>	
<del>8-7-302.6</del>	<del>Requirements for Bellows Nozzles</del>	<del>Y</del>	
<del>8-7-302.7</del>	<del>Requirements for Vapor Recovery Nozzles on Balance Systems</del>	<del>Y</del>	
<del>8-7-302.8</del>	<del>Minimum Liquid Removal Rate</del>	<del>Y</del>	
<del>8-7-302.9</del>	<del>Coaxial Hose Requirement</del>	<del>Y</del>	
<del>8-7-302.10</del>	<del>Construction Materials Specifications</del>	<del>Y</del>	
<del>8-7-302.12</del>	<del>Liquid Retain Limitation</del>	<del>Y</del>	
<del>8-7-302.13</del>	<del>Nozzle Spitting Limitation</del>	<del>Y</del>	
<del>8-7-302.14</del>	<del>Annual Back Pressure Test Requirements for Balance Systems</del>	<del>Y</del>	
8-7-303	Topping Off	Y	
8-7-304	Certification Requirements	Y	
8-7-306	Prohibition of Use	Y	
8-7-307	Posting of Operating Instructions	Y	
8-7-308	Operating Practices	Y	
<del>8-7-309</del>	<del>Contingent Vapor Recovery Requirement</del>	<del>Y</del>	
<del>8-7-315</del>	<del>Pressure Vacuum Valve Requirements, Underground Storage Tanks</del>	<del>Y</del>	
<del>8-7-316</del>	<del>Pressure Vacuum Valve Requirements, Aboveground Storage Tanks and Vaulted Below Grade Storage Tanks</del>	<del>Y</del>	
8-7-401	Equipment Installation and Modification	Y	
8-7-407	Periodic Testing Requirements	Y	
8-7-408	Periodic Testing Notification and Submission Requirements	Y	



**Table IV - I**  
**Source-specific Applicable Requirements**  
**S158 - GASOLINE DISPENSING ISLAND**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-7-501	Burden of Proof	Y	
8-7-502	Right of Access	Y	
8-7-503	Record Keeping Requirements	Y	
8-7-503.1	Gasoline Throughput Records	Y	
8-7-503.2	Maintenance Records	Y	
8-7-503.3	Records Retention Time	Y	
<b><u>BAAQMD Condition #20666</u></b>			
<u>Part 1</u>	<u>Phase I equipment installed and maintained per CARB Executive Order (Basis: Regulation 8-7-301.2)</u>	<u>Y</u>	
<u>Part 2</u>	<u>Triennial drop tube/drain valve and static adaptor torque test requirements (Basis: Regulation 8-7-301.2)</u>	<u>Y</u>	
<b><u>BAAQMD Condition #1299724278</u></b>	Throughput Limit (Basis: Toxic Risk Management Policy)	N	

As requested by USS-POSCO, throughput limit for Source 158, Gasoline Dispensing Island is lowered to 26,107 gallons per year. Table VII-I is revised to show limit of 26,107 gpy.

Following are the proposed changes in Section IV for S174:

**Table IV - N**  
**Source-specific Applicable Requirements**  
**S174 - KM CONTINUOUS ANNEALING FURNACE**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b><u>BAAQMD Regulation 6, Rule 1</u></b>	<b><u>Particulate Matter – General Requirements Particulate Matter and Visible Emissions (7/11/90)(12/05/07)</u></b>		
6- <del>1</del> -301	Ringelmann No. 1 Limitation	<del>N</del> Y	
6- <del>1</del> -305	Visible Particles	<del>N</del> Y	

**Table IV - N**  
**Source-specific Applicable Requirements**  
**S174 - KM CONTINUOUS ANNEALING FURNACE**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
6-1-310	Particulate Weight Limitation	<u>N</u>	
6-1-310.3	Particulate Weight Limitation, Heat Transfer Operation	<u>N<del>Y</del></u>	
<b><u>SIP Regulation 6</u></b>	<b><u>Particulate Matter and Visible Emissions (9/4/98)</u></b>		
<u>6-301</u>	<u>Ringelmann No. 1 Limitation</u>	<u>Y</u>	
<u>6-305</u>	<u>Visible Particles</u>	<u>Y</u>	
<u>6-310</u>	<u>Particulate Weight Limitation</u>	<u>Y</u>	
<u>6-310.3</u>	<u>Particulate Weight Limitation, Heat Transfer Operation</u>	<u>Y</u>	
<b>BAAQMD Regulation 9, Rule 1</b>	<b>Sulfur Dioxide (3/15/95)</b>		
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-302	General Emission Limitation	Y	
<b>BAAQMD Condition #7216</b>			
part F. 1	NOx Emission limitations (Basis: BACT, Cumulative increase)	Y	
part F. 2	CEM requirement (Basis: Regulation 1-521)	Y	
part F. 3	Required use of selective catalytic reduction unit (Basis: BACT, Cumulative increase)	Y	
part F. 4	NOx emission concentration or reduction requirements (Basis: BACT, Cumulative increase)	Y	
<u>Part F.5</u>	<u>Reporting requirement</u>	<u>Y</u>	

Part F5 is added to require reporting in cases of emission exceedances.

Following are the proposed changes in Section IV for S176:

**Table IV - O**  
**Source-specific Applicable Requirements**  
**S176 - ROLL ETCH MACHINE**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 6, Rule 1</b>	<del>Particulate Matter – General Requirements (12/05/07)</del> <del>Particulate Matter and Visible Emissions (7/11/90)</del>		
6- <del>1</del> -301	Ringelmann No. 1 Limitation	<del>N</del>	
6- <del>1</del> -305	Visible Particles	<del>N</del>	
6- <del>1</del> -310	Particulate Weight Limitation	<del>N</del>	
6- <del>1</del> -311	General Operations	<del>N</del>	
6- <del>1</del> -401	Appearance of Emissions	<del>N</del>	
<b>SIP Regulation 6</b>	<b>Particulate Matter and Visible Emissions (12/05/07)</b>		
<del>6-301</del>	<del>Ringelmann No. 1 Limitation</del>	<del>Y</del>	
<del>6-305</del>	<del>Visible Particles</del>	<del>Y</del>	
<del>6-310</del>	<del>Particulate Weight Limitation</del>	<del>Y</del>	
<del>6-311</del>	<del>General Operations</del>	<del>Y</del>	
<del>6-401</del>	<del>Appearance of Emissions</del>	<del>Y</del>	
<b>BAAQMD Condition #7216</b>			
part H. 1	Abatement required (Basis: BACT, Cumulative increase)	Y	
part H. 2	PM10 emission limitation (Basis: BACT, Cumulative increase)	Y	
part H. 3	Annual operation limitation (Basis: Cumulative increase)	Y	
part K. 1	PM10 source test options (Basis: Regulation 2-1-403)	Y	
part K. 2	Source test methods (Basis: Regulation 2-1-403)	Y	
<del>part K. 3</del>	<del>Periodic Source Test Requirement (Basis: Regulation 2-1-403)</del>	<del>Y</del>	
<del>part K. 4</del>	<del>Record keeping (Basis: Regulation 2-6-501)</del>	<del>Y</del>	
part N	Hours of operation recordkeeping (Basis: Regulation 2-6-501)	Y	
<b>BAAQMD Condition #20780</b>	<b>Inspection and Maintenance Requirements for Baghouses</b>		
part 1	Proper Baghouse Maintenance/Operation (Basis: Regulation 2-1-403)	Y	
part 2	Pressure Drop Monitor (Basis: Regulation 2-1-403)	Y	
part 3	Monthly Inspection Items (Basis: Regulation 2-1-403)	Y	
part 4	Visual Baghouse Inspection (Basis: Regulation 2-1-403)	Y	

**Table IV - O**  
**Source-specific Applicable Requirements**  
**S176 - ROLL ETCH MACHINE**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
part 5	Recordkeeping (Basis: Regulation 2-6-501)	Y	

Part K3 is changed to require source testing to show compliance for a PM10 concentration limit in Part H for Source 176. Part H was inadvertently not included in the list of parts to be source tested, so it is being added now.

Following are the proposed changes in Section IV for S178, S179, and S182:

**Table IV - Q**  
**Source-specific Applicable Requirements**  
**S178 - IRON OXIDE SILO #1**  
**S179 - IRON OXIDE BAGGING STATION**  
**S182 - IRON OXIDE SILO #2**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 6, Rule 1</b>	<del>Particulate Matter and Visible Emissions</del> <u>Particulate Matter – General Requirements (7/11/90)(12/05/07)</u>		
6- <del>1</del> -301	Ringelmann No. 1 Limitation	<del>N</del> Y	
6- <del>1</del> -305	Visible Particles	<del>N</del> Y	
6- <del>1</del> -310	Particulate Weight Limitation	<del>N</del> Y	
6- <del>1</del> -311	General Operations	<del>N</del> Y	
6- <del>1</del> -401	Appearance of Emissions	<del>N</del> Y	
<b>SIP Regulation 6</b>	<u>Particulate Matter and Visible Emissions (9/4/98)</u>		
<u>6-301</u>	<u>Ringelmann No. 1 Limitation</u>	Y	
<u>6-305</u>	<u>Visible Particles</u>	Y	
<u>6-310</u>	<u>Particulate Weight Limitation</u>	Y	
<u>6-311</u>	<u>General Operations</u>	Y	
<u>6-401</u>	<u>Appearance of Emissions</u>	Y	
<b>BAAQMD Condition #7216</b>			

**Table IV - Q**  
**Source-specific Applicable Requirements**  
**S178 - IRON OXIDE SILO #1**  
**S179 - IRON OXIDE BAGGING STATION**  
**S182 - IRON OXIDE SILO #2**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
part G. 5	HCl emission concentration limitation (Basis: BACT, Cumulative increase)	Y	
part G. 6	Abatement requirement (Basis: BACT, Cumulative increase)	Y	
part G. 7	Material handling requirement (Basis: RACT, Cumulative increase)	Y	
part G. 8	No visible emission requirement (Basis: Regulation 6-1-301)	Y	
part G. 9	Annual operation limitation (Basis: Cumulative increase)	Y	
part G. 10	PM10 emission limitation (Basis: Cumulative increase)	Y	
part G. 11	Annual Visible Emission Check (Basis: Regulation 2-6-503)	Y	
part G. 12	Record keeping requirements (Basis: Regulation 2-6-503)	Y	
part J. 1	Facility-wide HCl Emission Limitations (Basis: Regulation 2-6-423.2)	Y	
part J. 2	Facility-wide HCl Emission Calculations (Basis: Regulation 2-6-423.2)	Y	
part J. 3	Record keeping (Basis: Regulation 2-6-423.2)	Y	
part K. 1	PM10 source test options (Basis: Regulation 2-1-403)	Y	
part K. 2	Source test methods (Basis: Regulation 2-1-403)	Y	
part K. 3	Periodic Source Test Requirement (Basis: Regulation 2-1-403)	Y	
part K. 4	Record keeping (Basis: Regulation 2-6-501)	Y	
part L. 1	Periodic Source Test Requirement (Basis: Regulation 2-1-403)	Y	
part L. 2	Record keeping (Basis: Regulation 2-6-501)	Y	
part N	Hours of operation recordkeeping (Basis: Regulation 2-6-501)	Y	
<b>BAAQMD Condition #20780</b>	<b>Inspection and Maintenance Requirements for Baghouses: A35 and A38</b>		
part 1	Proper Baghouse Maintenance/Operation (Basis: Regulation 2-1-403)	Y	
part 2	Pressure Drop Monitor (Basis: Regulation 2-1-403)	Y	
part 3	Monthly Inspection Items (Basis: Regulation 2-1-403)	Y	
part 4	Visual Baghouse Inspection (Basis: Regulation 2-1-403)	Y	
part 5	Recordkeeping (Basis: Regulation 2-6-501)	Y	
<b>BAAQMD Condition #20781</b>	<b>Inspection and Maintenance Requirements for Wet Scrubbers</b>		
part 1	Proper Scrubber Maintenance/Operation (Basis: Regulation 2-1-403)	Y	
part 2	Operating Parameters (Basis: Regulation 2-1-403)	Y	
part 3	Monthly Inspection Items (Basis: Regulation 2-1-403)	Y	

**Table IV - Q**  
**Source-specific Applicable Requirements**  
**S178 - IRON OXIDE SILO #1**  
**S179 - IRON OXIDE BAGGING STATION**  
**S182 - IRON OXIDE SILO #2**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
part 4	<a href="#">Recordkeeping (Basis: Regulation 2-6-501)</a>	N	
<b><a href="#">BAAQMD Condition #25311</a></b>	<b><a href="#">CAM Requirements</a></b>		
part 1	<a href="#">Appraisal of visible emissions (Regulation 6-1-601)</a>	Y	
part 2	<a href="#">Exceedance and Excursion (40 CFR Part 64.6(c)(2))</a>	Y	
part 3	<a href="#">Pressure monometer and liquid flow rate meter requirements (40 CFR Part 64.6(c)(1), 40 CFR Part 63.1350(m)(6)(iii))</a>	Y	
part 4	<a href="#">Pressure Drop / Liquid Flow Rate Operation Ranges (40 CFR Part 64.4(a))</a>	Y	
part 5	<a href="#">Pressure Drop / Liquid Flow Rate Readings (40 CFR Part 64.3(b)(4)(iii))</a>	Y	
part 6	<a href="#">Minimize Emissions if Exceedance Occurs (40 CFR Part 64.6(c)(3), 64.7(d)(2), 64.8)</a>	Y	
part 7	<a href="#">Gauge/Meter Calibration (40 CFR Part 64.3(b)(3))</a>	Y	
part 8	<a href="#">Monitor Report (40 CFR Part 64.6(c)(3), 40 CFR Part 64.9(a)(2))</a>	Y	
part 9	<a href="#">Abatement Device Inspection (40 CFR 64.6(c)(1)(iii))</a>	Y	
part 10	<a href="#">Recordkeeping (Regulation -26-501)</a>	Y	

CAM requirements for the above sources and their associated abatement devices were added.

Following are the proposed changes in Section IV for S190, S195, S202, S206, S210, S215, S305, S308, S311, and S317:

**Table IV - S**  
**Source-specific Applicable Requirements**  
**S190, ~~S-195,S191,S194~~ THROUGH ~~S195~~6, S202, S206, ~~S208~~, S210, ~~S214~~, S215, ~~S305~~, ~~SS218-308~~, S311, AND S317 -- COLD CLEANERS**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
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**Table IV - S**  
**Source-specific Applicable Requirements**  
**S190, S-195,S191,S194 ~~THROUGH S195~~6, S202, S206, ~~S208~~, S210, ~~S214~~, S215, S305,  
~~SS218-308, S311, AND S317~~ -- COLD CLEANERS**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8, Rule 16</b>	<b>Organic Compounds – Solvent Cleaning Operations (10/16/02)</b>		
8-16-118	Limited Exemption, Compounds of Low Volatility	Y	
8-16-118	Limited Exemption, Compounds of Low Volatility	Y	
8-16-303	Cold Cleaner Requirements		
8-16-303.1	General Operating Requirements	Y	
8-16-303.1.1	Operate and Maintain in Proper Working Order	Y	
8-16-303.1.2	Leak Repair Requirement	Y	
8-16-303.1.3	Solvent Storage or Disposal – Evaporation Prevention	Y	
8-16-303.1.4	Waste Solvent Disposal	Y	
8-16-303.1.4(a)	Covered Containers for Waste Solvent Awaiting Pick-up	Y	
8-16-303.1.4(b)	On-site Waste Treatment	Y	
8-16-303.1.5	Solvent Evaporation Minimization Devices shall not be Removed	Y	
8-16-303.1.6	Solvent Spray Requirements	Y	
8-16-303.2	Cold Cleaner Operating Requirements		
8-16-303.2.1	Solvent shall be Drained from Cleaned Parts	Y	
8-16-303.2.2	No Solvent Agitation by Air	Y	
8-16-303.2.3	Solvent Cleaning of Porous or Absorbent Materials is Prohibited	Y	
8-16-303.3	Cold Cleaner General Equipment Requirements		
8-16-303.3.1	Container	Y	
8-16-303.3.2	Solvent Evaporation Reduction for Idle Equipment	Y	
8-16-303.3.3	Used Solvent Returned to Container	Y	
8-16-303.3.4	Label Stating Operating Requirements	Y	
8-16-303.5	Repair and Maintenance Cleaner Requirements		
8-16-303.5.1	VOC Content Limitation	N	
8-16-303.5.2	VMS solvent allowance	N	
8-16-303.5.3	VOC Content Limitation plus VMS solvent allowance	N	
8-16-501	Solvent Records		
8-16-501.2	Facility-wide, monthly records	N	
8-16-501.5	Twenty-four month record retention	Y	

**Table IV - S**  
**Source-specific Applicable Requirements**  
**S190, ~~S-195,S191,S194 THROUGH S195~~6, S202, S206, ~~S208~~, S210, ~~S214~~, S215, ~~S305~~,  
~~SS218-308, S311, AND S317~~ -- COLD CLEANERS**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-16-502	Burden of Proof (to Demonstrate exemption per Regulation 8-16-118)	N	
<del>SIP BAAQMD Regulation 8, Rule 16</del>	<del>Solvent Cleaning Operations (9/16/98)</del>		
<del>8-16-118</del>	<del>Limited Exemption, Compounds of Low Volatility</del>	<del>Y</del>	
<del>8-16-303</del>	<del>Cold-Cleaner Requirements</del>		
<del>8-16-303.1</del>	<del>—General Operating Requirements</del>	<del>Y</del>	
<del>8-16-303.1.1</del>	<del>—Operate and Maintain in Proper Working Order</del>	<del>Y</del>	
<del>8-16-303.1.2</del>	<del>—Leak Repair Requirement</del>	<del>Y</del>	
<del>8-16-303.1.3</del>	<del>—Solvent Storage or Disposal—Evaporation Prevention</del>	<del>Y</del>	
<del>8-16-303.1.4</del>	<del>—Waste Solvent Disposal</del>	<del>Y</del>	
<del>8-16-303.1.4(a)</del>	<del>—Covered Containers for Waste Solvent Awaiting Pick up</del>	<del>Y</del>	
<del>8-16-303.1.4(b)</del>	<del>—On-site Waste Treatment</del>	<del>Y</del>	
<del>8-16-303.1.5</del>	<del>—Solvent Evaporation Minimization Devices shall not be Removed</del>	<del>Y</del>	
<del>8-16-303.1.6</del>	<del>—Solvent Spray Requirements</del>	<del>Y</del>	
<del>8-16-303.2</del>	<del>—Cold Cleaner Operating Requirements</del>		
<del>8-16-303.2.1</del>	<del>—Solvent shall be Drained from Cleaned Parts</del>	<del>Y</del>	
<del>8-16-303.2.2</del>	<del>—No Solvent Agitation by Air</del>	<del>Y</del>	
<del>8-16-303.2.3</del>	<del>—Solvent Cleaning of Porous or Absorbent Materials is Prohibited</del>	<del>Y</del>	
<del>8-16-303.3</del>	<del>—Cold Cleaner General Equipment Requirements</del>		
<del>8-16-303.3.1</del>	<del>—Container</del>	<del>Y</del>	
<del>8-16-303.3.2</del>	<del>—Solvent Evaporation Reduction for Idle Equipment</del>	<del>Y</del>	
<del>8-16-303.3.3</del>	<del>—Used Solvent Returned to Container</del>	<del>Y</del>	
<del>8-16-303.3.4</del>	<del>—Label Stating Operating Requirements</del>	<del>Y</del>	
<del>8-16-501</del>	<del>—Solvent Records</del>		
<del>8-16-501.2</del>	<del>—Facility wide, annual records</del>	<del>Y</del>	
<del>8-16-501.5</del>	<del>—Twenty-four month record retention</del>	<del>Y</del>	
<del>BAAQMD Condition #2086616920</del>			



**Table IV - S**  
**Source-specific Applicable Requirements**  
**S190, ~~S-195,S191,S194 THROUGH S195~~6, S202, S206, ~~S208~~, S210, ~~S214~~, S215, ~~S305~~,  
~~SS218-308, S311, AND S317~~ -- COLD CLEANERS**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
part 1	Solvent usage allowance (Basis: Cumulative increase)	Y	
part 2	Optional solvent emission allowance (Basis: Cumulative increase and Toxic Risk Screen)	Y	
part 3	Recordkeeping (Basis: Cumulative increase and Toxic Risk Screen)	Y	

All cold cleaners are consolidated to this table and made subject to one revised Condition 20866. Condition 16920 has been archived. The current version of BAAQMD Regulation 8, Rule 16 has received EPA approval so the previous SIP version has been deleted.

Since all cold cleaners are consolidated to one table, Tables for S217, S285, and S300 through S312 in Section IV are proposed to be deleted.

Following are the proposed changes in Section IV for S286 and S287:

**Table IV - ~~TSV~~**  
**Source-specific Applicable Requirements**  
**S286 - #1 CRU Evaporator - TFS Operation**  
**S287 - #2 CRU Evaporator - ETL Lines**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<del>BAAQMD Regulation 6, Rule 1</del>	<del>Particulate Matter and Visible Emissions</del> <u>Particulate Matter – General Requirements (12/19/9012/05/07)</u>		
<del>6-1-301</del>	Ringelmann No. 1 Limitation	<del>Y</del> <u>N</u>	
<del>6-1-305</del>	Visible Particulates	<del>Y</del> <u>N</u>	
<del>6-1-310</del>	Particulate Weight Limitation	<del>Y</del> <u>N</u>	
<del>6-1-401</del>	Appearance of Emissions	<del>Y</del> <u>N</u>	
<del>SIP Regulation 6</del>	<u>Particulate Matter and Visible Emissions (9/4/98)</u>		
<del>6-301</del>	<u>Ringelmann No. 1 Limitation</u>	<u>Y</u>	
<del>6-305</del>	<u>Visible Particles</u>	<u>Y</u>	

**Table IV - ~~TSV~~**  
**Source-specific Applicable Requirements**  
**S286 - #1 CRU Evaporator - TFS Operation**  
**S287 - #2 CRU Evaporator - ETL Lines**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
6-310	<u>Particulate Weight Limitation</u>	<u>Y</u>	
6-401	<u>Appearance of Emissions</u>	<u>Y</u>	
<b>BAAQMD Condition #12194</b>			
part 1	Hexavalent chromium emission limitation (Basis: Toxic Risk Screen)	Y	
part 2	Source test requirement every two years (Basis: Regulation 2-1-304)	Y	
part 3	Ongoing Compliance Monitoring (Basis: Toxic Risk Screen)	Y	
part 4	Non-resettable clock requirement (Basis: Toxic Risk Screen)	Y	
part 5	Recordkeeping (Basis: Toxic Risk Screen)	Y	
<b><del>BAAQMD Condition #20781</del></b>	<b><del>Inspection and Maintenance Requirements for Wet Scrubbers</del></b>		
<del>part 1</del>	<del>Proper Scrubber Maintenance/Operation (Basis: Regulation 2-1-403)</del>	<del>Y</del>	
<del>part 2</del>	<del>Operating Parameters (Basis: Regulation 2-1-403)</del>	<del>Y</del>	
<del>part 3</del>	<del>Monthly Inspection Items (Basis: Regulation 2-1-403)</del>	<del>Y</del>	
<del>part 4</del>	<del>Recordkeeping (Basis: Regulation 2-6-501)</del>	<del>Y</del>	

The table number has been changed. Since S286 and S287 have never been abated by wet scrubbers but have been abated by demisters, Condition 12194 was revised to monitor evaporator operation and S286 and S287 were made NOT subject to Condition 20781.

Table for S289 in Section IV is deleted since S289 has been archived.

Following are the proposed changes in Section IV for S290:

**Table IV - ~~UX~~**  
**Source-specific Applicable Requirements**  
**S290 - #2 Continuous Galvanize Line-Strip Stenciller**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
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**Table IV - ~~UX~~**  
**Source-specific Applicable Requirements**  
**S290 - #2 Continuous Galvanize Line-Strip Stenciller**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8, Rule 4</b>	<b>Organic Compounds – General Solvent and Surface Coating Operations (10/16/02)</b>		
8-4-302	Solvents and Surface Coating Requirements		
8-4-302.1	VOC emissions not more than 5 tpy per source	Y	
8-4-501	Coating Records	Y	
<del>SIP Regulation 8, Rule 4</del>	<del>Organic Compounds – General Solvent and Surface Coating Operations (12/23/97)</del>		
<del>8-4-302</del>	<del>Solvents and Surface Coating Requirements</del>		
<del>8-4-302.1</del>	<del>VOC emissions not more than 5 tpy per source</del>	<del>Y</del>	
<del>8-4-501</del>	<del>Coating Records</del>	<del>Y</del>	
<b>BAAQMD Condition #13634</b>			
part 1	Coating usage limitations (Basis: Cumulative increase)	Y	
part 2	Optional POC emission allowance (Basis: Cumulative increase, Risk Management Policy)	Y	
part 3	Recordkeeping (Basis: Cumulative increase, Risk Management Policy)	Y	
part 4	Cumulative increase refund option (Basis: Cumulative increase)	Y	

The table number has been changed. The current version of BAAQMD Regulation 8, Rule 4 has received EPA approval so the previous SIP version has been deleted.

Following are the proposed changes in Section IV for S292:

**Table IV - ~~VY~~**  
**Source-specific Applicable Requirements**  
**S292 - KMCAL Horizontal Electrostatic Oiler**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8, Rule 11</b>	<b>Organic Compounds – Metal Container, Closure and Coil Coating (11/19/97)</b>		

**Table IV - ~~VY~~**  
**Source-specific Applicable Requirements**  
**S292 - KMCAL Horizontal Electrostatic Oiler**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-11-303	Coil Coating Limitation	Y	
8-11-304	Emission Control Device Limitation for Coil Coating	Y	
8-11-501	Coating Records	Y	
<b>BAAQMD Condition #16682</b>			
part 1	Coating usage limitations (Basis: Cumulative increase, toxic risk screen)	Y	
part 2	Optional POC emission allowance (Basis: Cumulative increase, toxic risk screen)	Y	
part 3	Abatement required and allowed emission rate per gallon (Basis: Cumulative increase)	Y	
part 4	Recordkeeping (Basis: Cumulative increase, toxic risk screen)	Y	
part 5	Source test requirement every two years (Basis: Cumulative increase, toxic risk screen)	Y	
part 6	Proper Oil Mist Precipitator Maintenance/Operation (Basis: Regulation 2-1-403)	Y	
part 7	Normal Oil Mist Precipitator Voltage and Current to Be Determined	Y	
part 8	Monthly Inspection Items (Basis: Regulation 2-1-403)	Y	
part 9	Inspection Recordkeeping (Basis: Regulation 2-6-501)	Y	

The table number has been changed.

Following are the proposed changes in Section IV for S293 through S297:

**Table IV - WZ**  
**Source-specific Applicable Requirements**  
**S293 - Emergency Standby Generator-TWTP, diesel fueled**  
**S294 - Emergency Standby Generator-KMCAL, diesel fueled**  
**S295 - Emergency Generator-Filter Plant, diesel fueled**  
**S296 - Standby Generator - #2 CC Line, diesel fueled**  
**S297 - Emergency Standby Generator-Computer Bldg, diesel fueled**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 6, Rule 1</b>	<b><u>Particulate Matter – General Requirements (12/05/07)</u></b> <b><u>Particulate Matter and Visible Emissions (12/19/90)</u></b>		
6-303	Ringelmann No. 2 Limitation	<u>YN</u>	
6-305	Visible Particulates	<u>NY</u>	
6-310	Particulate Weight Limitation	<u>NY</u>	
6-401	Appearance of Emissions	<u>NY</u>	
<b><u>SIP Regulation 6</u></b>	<b><u>Particulate Matter and Visible Emissions (9/4/98)</u></b>		
<u>6-303</u>	<u>Ringelmann No. 2 Limitation</u>	<u>Y</u>	
<u>6-305</u>	<u>Visible Particles</u>	<u>Y</u>	
<u>6-310</u>	<u>Particulate Weight Limitation</u>	<u>Y</u>	
<u>6-401</u>	<u>Appearance of Emissions</u>	<u>Y</u>	
<b>BAAQMD Regulation 9, Rule 1</b>	<b>Inorganic Gaseous Pollutants, Sulfur Dioxide (3/15/95)</b>		
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-304	Fuel Burning (Liquid and Solid Fuels)	Y	
<b>BAAQMD Regulation 9, Rule 8</b>	<b>Inorganic Gaseous Pollutants (<u>7/25/078/1/01</u>)</b>		
9-8-330	Emergency Standby Engines, Hours of Operation	N	
9-8-530	Emergency standby engines, monitoring and recordkeeping	N	
<b><u>California Code of Regulations, Title 17, Section 93115</u></b>	<b><u>ATCM for Stationary Compression Ignition Engines</u></b>		

**Table IV - WZ**  
**Source-specific Applicable Requirements**  
**S293 - Emergency Standby Generator-TWTP, diesel fueled**  
**S294 - Emergency Standby Generator-KMCAL, diesel fueled**  
**S295 - Emergency Generator-Filter Plant, diesel fueled**  
**S296 - Standby Generator - #2 CC Line, diesel fueled**  
**S297 - Emergency Standby Generator-Computer Bldg, diesel fueled**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
93115.6(b)(3)(A)1.a	<u>Maximum Allowable Annual Hours of Operation for Maintenance and Testing &lt; 20 hrs/yr</u>	<u>N</u>	
93115.10(d)(1)	<u>Non-resettable totalizing meter</u>	<u>N</u>	
93115.10(f)(1)	<u>Recordkeeping.</u>	<u>N</u>	
<b>40 CFR 63 Subpart <u>ZZZZ</u></b>	<b><u>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</u></b>		
63.6585	<u>Applicability</u>	<u>Y</u>	
63.6585(a)	<u>Applicable to stationary RICE</u>	<u>Y</u>	
63.6585(c)	<u>Applicable to area source of HAPs</u>	<u>Y</u>	
63.6590	<u>Subject to subpart <u>ZZZZ</u></u>	<u>Y</u>	
63.6590(a)(1)(iii)	<u>Existing stationary RICE at an area source of HAPs</u>	<u>Y</u>	
63.6595	<u>Compliance Schedule to 40 CFR 63, Subpart <u>ZZZZ</u></u>	<u>Y</u>	
63.6595(a)(1)	<u>Comply with the applicable emission limitation and operating limitations no later than May 3, 2013</u>	<u>Y</u>	<u>5/3/2013</u>
63.6603	<u>Emission Limitations and Operating Limitations for Existing Stationary RICE located at an area source of HAP emissions</u>	<u>Y</u>	<u>5/3/2013</u>
63.6603(a), Table 2d.4	<u>Change oil and filter every 500 hours of operation or annually, whichever comes first; Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</u>	<u>Y</u>	<u>5/3/2013</u>
63.6605	<u>General Requirements</u>	<u>Y</u>	
63.6605(a)	<u>Comply with the emission limitations and operating limitations at all times</u>	<u>Y</u>	
63.6605(b)	<u>Safety and good air pollution control practices for minimizing emissions</u>	<u>Y</u>	
63.6625	<u>Monitoring, Installation, Operation, and Maintenance Requirements</u>	<u>Y</u>	
63.6625(e)(3)	<u>Operate and maintain engine and after-treatment control device (if any) in a manner consistent with good air pollution control practice for minimizing emissions</u>	<u>Y</u>	
63.6625(f)	<u>Install a non-resettable hour meter if one is not already installed</u>	<u>Y</u>	

**Table IV - WZ**  
**Source-specific Applicable Requirements**  
**S293 - Emergency Standby Generator-TWTP, diesel fueled**  
**S294 - Emergency Standby Generator-KMCAL, diesel fueled**  
**S295 - Emergency Generator-Filter Plant, diesel fueled**  
**S296 - Standby Generator - #2 CC Line, diesel fueled**  
**S297 - Emergency Standby Generator-Computer Bldg, diesel fueled**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<a href="#">63.6625(h)</a>	<a href="#">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</a>	<a href="#">Y</a>	
<a href="#">63.6635</a>	<a href="#">Monitor and Collect Data to Demonstrate Continuous Compliance</a>	<a href="#">Y</a>	
<a href="#">63.6640</a>	<a href="#">Demonstrate Continuous Compliance with the Emission Limitations and Operating Limitations</a>	<a href="#">Y</a>	
<a href="#">63.6640(f)(1)</a>	<a href="#">Requirements for an existing emergency stationary RICE located at an area source of HAP emissions.</a>	<a href="#">Y</a>	
<a href="#">63.6645</a>	<a href="#">Notification, Reports, and Records</a>	<a href="#">Y</a>	
<a href="#">63.6645(a)(2)</a>	<a href="#">Submit notification in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply</a>	<a href="#">Y</a>	
<a href="#">63.6655</a>	<a href="#">Recordkeeping</a>	<a href="#">Y</a>	
<a href="#">63.6655(a)</a>	<a href="#">Recordkeeping with the emission and operating limitations</a>	<a href="#">Y</a>	
<a href="#">63.6655(e)(2)</a>	<a href="#">Keep records of the maintenance conducted on an existing emergency RICE</a>	<a href="#">Y</a>	
<a href="#">63.6660</a>	<a href="#">Recordkeeping</a>	<a href="#">Y</a>	
<b>BAAQMD Condition #18544</b>			
Part 1	Allowable hours of operation (Basis: Regulation 9-8-330)	Y	
Part 2	Non-Resettable Counter Requirement (Regulation 9-8-530)	Y	
Part 3	Hours of Operation Recordkeeping Requirement (Regulations 9-8-530)	Y	

The table number is changed. Requirements of Code of Federal Regulation, Title 40, Part 63, subpart ZZZZ – NESHAP for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines are added.

Following are the proposed changes in Section IV for S299:

**Table IV – ~~X~~AA**  
**Source-specific Applicable Requirements**  
**S299 - Diesel Fire Pump Packaged System, 2500 gpm, diesel fueled**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 6, Rule 1</b>	<del>Particulate Matter and Visible Emissions</del> <u>Particulate Matter – General Requirements (12/19/9012/05/07)</u>		
6-1-303	Ringelmann No. 2 Limitation	<del>Y</del> N	
6-1-305	Visible Particulates	<del>N</del> Y	
6-1-310	Particulate Weight Limitation	<del>N</del> Y	
6-1-401	Appearance of Emissions	<del>N</del> Y	
<b>SIP Regulation 6</b>	<u>Particulate Matter and Visible Emissions (9/4/98)</u>		
6-303	<u>Ringelmann No. 2 Limitation</u>	Y	
6-305	<u>Visible Particles</u>	Y	
6-310	<u>Particulate Weight Limitation</u>	Y	
6-401	<u>Appearance of Emissions</u>	Y	
<b>BAAQMD Regulation 9, Rule 1</b>	<b>Inorganic Gaseous Pollutants, Sulfur Dioxide (3/15/95)</b>		
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-304	Fuel Burning (Liquid and Solid Fuels)	Y	
<b>BAAQMD Regulation 9, Rule 8</b>	<b>Inorganic Gaseous Pollutants (<del>8/1/01</del>7/25/07)</b>		
9-8-330	Emergency Standby Engines, Hours of Operation	N	
9-8-530	Emergency standby engines, monitoring and recordkeeping	N	
<b>California Code of Regulations, Title 17, Section 93115</b>	<u>ATCM for Stationary Compression Ignition Engines</u>		
93115.6(b)(3)(A)1.b	<u>Maximum Allowable Annual Hours of Operation for Maintenance and Testing &lt; 30 hrs/yr</u>	N	
93115.10(d)(1)	<u>Non-resettable totalizing meter</u>	N	
93115.10(f)(1)	<u>Recordkeeping.</u>	N	
<b>40 CFR 63 Subpart</b>	<u>National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines</u>		



**Table IV – ~~X~~AA**  
**Source-specific Applicable Requirements**  
**S299 - Diesel Fire Pump Packaged System, 2500 gpm, diesel fueled**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<u>ZZZZ</u>			
63.6585	<u>Applicability</u>	<u>Y</u>	
63.6585(a)	<u>Applicable to stationary RICE</u>	<u>Y</u>	
63.6585(c)	<u>Applicable to area source of HAPs</u>	<u>Y</u>	
63.6590	<u>Subject to subpart ZZZZ</u>	<u>Y</u>	
63.6590(a)(1)(iii)	<u>Existing stationary RICE at an area source of HAPs</u>	<u>Y</u>	
63.6595	<u>Compliance Schedule to 40 CFR 63, Subpart ZZZZ</u>	<u>Y</u>	
63.6595(a)(1)	<u>Comply with the applicable emission limitation and operating limitations no later than May 3, 2013</u>	<u>Y</u>	<u>5/3/2013</u>
63.6603	<u>Emission Limitations and Operating Limitations for Existing Stationary RICE located at an area source of HAP emissions</u>	<u>Y</u>	<u>5/3/2013</u>
63.6603(a), Table 2d.4	<u>Change oil and filter every 500 hours of operation or annually, whichever comes first; Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.</u>	<u>Y</u>	<u>5/3/2013</u>
63.6605	<u>General Requirements</u>	<u>Y</u>	
63.6605(a)	<u>Comply with the emission limitations and operating limitations at all times</u>	<u>Y</u>	
63.6605(b)	<u>Safety and good air pollution control practices for minimizing emissions</u>	<u>Y</u>	
63.6625	<u>Monitoring, Installation, Operation, and Maintenance Requirements</u>	<u>Y</u>	
63.6625(e)(3)	<u>Operate and maintain engine and after-treatment control device (if any) in a manner consistent with good air pollution control practice for minimizing emissions</u>	<u>Y</u>	
63.6625(f)	<u>Install a non-resettable hour meter if one is not already installed</u>	<u>Y</u>	
63.6625(h)	<u>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</u>	<u>Y</u>	
63.6635	<u>Monitor and Collect Data to Demonstrate Continuous Compliance</u>	<u>Y</u>	
63.6640	<u>Demonstrate Continuous Compliance with the Emission Limitations and Operating Limitations</u>	<u>Y</u>	
63.6640(f)(1)	<u>Requirements for an existing emergency stationary RICE located at an area source of HAP emissions.</u>	<u>Y</u>	
63.6645	<u>Notification, Reports, and Records</u>	<u>Y</u>	
63.6645(a)(2)	<u>Submit notification in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply</u>	<u>Y</u>	

**Table IV – ~~XAA~~**  
**Source-specific Applicable Requirements**  
**S299 - Diesel Fire Pump Packaged System, 2500 gpm, diesel fueled**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<u>63.6655</u>	<u>Recordkeeping</u>	<u>Y</u>	
<u>63.6655(a)</u>	<u>Recordkeeping with the emission and operating limitations</u>	<u>Y</u>	
<u>63.6655(e)(2)</u>	<u>Keep records of the maintenance conducted on an existing emergency RICE</u>	<u>Y</u>	
<u>63.6660</u>	<u>Recordkeeping</u>	<u>Y</u>	
<b>BAAQMD Condition #19380</b>			
Part 1	Fuel sulfur limit (Basis: BACT)	Y	
Part 2	Allowable hours of operation (Basis: Cumulative increase)	Y	
Part 3	Non-Resettable Counter Requirement (Regulation 9-8-530)	Y	
Part 4	Hours of Operation Recordkeeping Requirement (Regulations 9-8-530)	Y	

The table number is changed. Requirements of Code of Federal Regulation, Title 40, Part 63, subpart ZZZZ – NESHAP for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines are added.

Following are the proposed changes in Section IV for S400 and S401:

**Table IV - YCC**  
**Source-specific Applicable Requirements**  
**S400 - Contaminated Soils (SWMUs) – “Out”**  
**~~S401 – Contaminated Soils (CAMU) – “In”~~**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 6, Rule 1</b>	<del>Particulate Matter and Visible Emissions</del> <u>Particulate Matter – General Requirements (12/05/0712/19/90)</u>		
<del>6-1-301</del>	Ringelmann No. 1 Limitation	<del>Y</del> <u>N</u>	
<del>6-1-305</del>	Visible Particulates	<del>Y</del> <u>N</u>	
<del>6-1-310</del>	Particulate Weight Limitation	<del>Y</del> <u>N</u>	
<del>6-1-401</del>	Appearance of Emissions	<del>Y</del> <u>N</u>	
<b>SIP Regulation 6</b>	<u>Particulate Matter – General Requirements (0/4/98)</u>		

**Table IV - ~~YCC~~**  
**Source-specific Applicable Requirements**  
**S400 - Contaminated Soils (SWMUs) – “Out”**  
**~~S401 – Contaminated Soils (CAMU) – “In”~~**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
<u>6-301</u>	<u>Ringelmann No. 1 Limitation</u>	<u>Y</u>	
<u>6-305</u>	<u>Visible Particles</u>	<u>Y</u>	
<u>6-310</u>	<u>Particulate Weight Limitation</u>	<u>Y</u>	
<u>6-401</u>	<u>Appearance of Emissions</u>	<u>Y</u>	
<b>BAAQMD Condition #20038</b>			
Part 1	Follow corrective action plan (Basis: CEQA)	Y	
Part 2	No visible emissions (Basis: BACT, Regulation 1-301)	Y	
Part 3	Cover trucks or maintain minimum freeboard and/or water top layer (Basis: BACT)	Y	
Part 4	Recordkeeping requirements (Basis: Cumulative increase)	Y	

The table number is changed. Since the Permit to Operate S401 has been surrendered, it is deleted from table.

Following are the proposed changes in Section IV for S402:

**Table IV - Z**  
**Source-specific Applicable Requirements**  
**S402 - Horizontal Electrostatic Oiler, Peabody HO LBO 609**

<b><u>Applicable Requirement</u></b>	<b><u>Regulation Title or Description of Requirement</u></b>	<b><u>Federally Enforceable (Y/N)</u></b>	<b><u>Future Effective Date</u></b>
<b><u>BAAQMD Regulation 8, Rule 11</u></b>	<b><u>Organic Compounds – Metal Container, Closure and Coil Coating (11/19/97)</u></b>		
<u>8-11-303</u>	<u>Coil Coating Limitation</u>	<u>Y</u>	
<u>8-11-304</u>	<u>Emission Control Device Limitation for Coil Coating</u>	<u>Y</u>	
<u>8-11-501</u>	<u>Coating Records</u>	<u>Y</u>	

**Table IV - Z**  
**Source-specific Applicable Requirements**  
**S402 - Horizontal Electrostatic Oiler, Peabody HO LBO 609**

<u>Applicable Requirement</u>	<u>Regulation Title or Description of Requirement</u>	<u>Federally Enforceable (Y/N)</u>	<u>Future Effective Date</u>
<u>BAAQMD Condition #25272</u>			
<u>part 1</u>	<u>Coating usage limitations (Basis: Cumulative increase)</u>	<u>Y</u>	
<u>part 2</u>	<u>POC and NPOC emission limits (Basis: Cumulative increase, emission offsets, toxic risk screen)</u>	<u>Y</u>	
<u>part 3</u>	<u>Recordkeeping (Basis: Cumulative increase, emission offsets, toxic risk screening)</u>	<u>Y</u>	

S402 was permitted through AN 24291 on 7/16/12. Table for S 402 is proposed to be added in Section IV.

**V. Schedule of Compliance**

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 which provides that a major facility review permit shall contain the following information and provisions:

“409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.”

Since the District has not determined that the facility is out of compliance with an applicable requirement, the schedule of compliance for this permit contains only sections 2-6-409.10.1 and 2-6-409.10.2.

The BAAQMD Compliance and Enforcement Division has conducted a review of compliance over the past year and has no records of compliance problems at this facility during the past year. The compliance report is contained in Appendix L of this permit evaluation and statement of basis.

## VI. Permit Conditions

During the Title V permit development, the District has reviewed the existing permit conditions, deleted the obsolete conditions, and, as appropriate, revised the conditions for clarity and enforceability. Each permit condition is identified with a unique numerical identifier, up to five digits.

When necessary to meet Title V requirements, additional monitoring, recordkeeping, or reporting requirements have been added to the permit.

All changes to existing permit conditions are clearly shown in “strike-out/underline” format in the proposed permit. When the permit is issued, all “strike-out” language will be deleted and all “underline” language will be retained, subject to consideration of comments received.

The existing permit conditions are derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). Permit conditions may also be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 *et seq.*, an order of abatement pursuant to H&SC § 42450 *et seq.*, or as an administrative revision initiated by District staff. After issuance of the Title V permit, permit conditions will be revised using the procedures in Regulation 2, Rule 6, Major Facility Review.

Conditions that are obsolete or that have no regulatory basis have been deleted from the permit.

Conditions have also been deleted due to the following:

- Redundancy in recordkeeping requirements.
- Redundancy in other conditions, regulations and rules.
- The condition has been superseded by other regulations and rules.
- The equipment has been taken out of service or is exempt.
- The event has already occurred (i.e. initial or start-up source tests).

The regulatory basis is listed following each condition. The regulatory basis may be a rule or regulation. The District is also using the following terms for regulatory basis:

- BACT: This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- Cumulative Increase: This term is used for a condition imposed by the APCO that limits a source’s operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- Offsets: This term is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- PSD: This term is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit issued pursuant to Regulation 2, Rule 2.

- TRMP: This term is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District's Toxic Risk Management Policy.

Parameter monitoring requirement(s) has been added for each abatement device. Additional monitoring has been added, where appropriate, to assure compliance with the applicable requirements.

Changes to permit:

Many conditions were reworded to include "owner/operator" to ensure legal accountability in the case of violation.

BAAQMD Conditions 6818, 12790 and 16920 are deleted since Condition 20866 was expanded to incorporate all cold cleaners.

With the Title V Application 10350, changes are proposed for BAAQMD Conditions 7216, 12194, 12997 (changed and replaced by 24278), 20038 and 20781. The changes to BAAQMD Conditions 7216, 12194 and 20781 are significant revisions to the Major Facility Review permit in accordance with BAAQMD Regulation 2-6-226.3 because there is a change in monitoring and recordkeeping.

Parts F and K3 of BAAQMD Condition 7216 are changed. Only Parts F and K3 of BAAQMD Condition 7216 are shown below since the condition is several pages long. Part F2 is changed for following separate reasons. First, the targets and the frequency of monitoring are now specified. Second, the monitors are required to comply with the District's Manual of Procedures. Third, S174 has a combined daily mass NOx emission limit with Source 177 and Part F2 is proposed to now indicate that the CEMs would be used to show compliance with that limit. Fourth, we propose not requiring the use of the CEMs during furnace idling provided a low emission rate for NOx is assumed. Lastly, we propose to clarify that the hourly NOx limits in Part F4 are on a *clock* hour basis and that the *thin gauge coil* provision be revised to be based on a reduced firing rate. The *thin gauge coil* provision was initially added in 1995 under Permit Application 14797 and required 80% NOx abatement when running thin gauge coil since the furnace firing rate and resulting NOx emissions were lower than normal during this operation. Upon further review, another similar low fire condition is a line stoppage where the annealing furnace is also fired at a rate less than 65,000 standard cubic feet of natural gas per hour. Part F5 is added to require reporting if an exceedance occurs.

Part K3 is changed to require source testing to show compliance for a PM10 concentration limit in Part H for S176. Part H was inadvertently not included in the list of parts to be source tested so is being added now.

**Condition # 7216**

F. Conditions for S174

1. The Owner/Operator shall ensure that in no event do shall the combined daily emissions from S174 and S177 exceed 100 lbs/day of nitrogen oxides (measured as NO<sub>2</sub>).  
(Basis: BACT, Cumulative increase)

2. For the purpose of demonstrating compliance with part F. 1 and 4 a, b, and c for S174, the Owner/Operator shall install, calibrate and operate District approved continuous in-stack emission monitors and recorders for oxides of nitrogen, and either oxygen or carbon dioxide. The Owner/Operator shall report d Daily emissions shall be reported to the District on a monthly basis, the format of which shall be subject to approval by the APCO. In lieu of operating the CEMs during furnace idling, which is described in part F. 3 below, UPI may assume emissions of nitrogen oxides (measured as NO<sub>2</sub>) are 0.005 pounds per minute.  
(Basis: Regulation 1-521)

3. The Owner/Operator shall ensure that t The Selective Catalytic Reduction Unit (SCR) A32 shall be is operated during all periods of the annealing furnace operation, with the exception of during a cold startup of the annealing furnace, which is not to exceed 3 hours, and during furnace idling. A cold startup includes periods when the SCR temperature is less than 392 F. Furnace idling includes periods when natural gas is being fired but at a rate of less than 17 scfm (approximately 1 thousand scfh).  
(Basis: BACT, Cumulative increase)

4. The Owner/Operator shall ensure that, e Excluding periods of cold startup and furnace idling, NO<sub>x</sub> emissions in the exhaust from this source shall meet one of the following:

- a. Not exceed 10 ppmv at 3% oxygen, averaged over 3 consecutive hours;
- b. Be reduced by at least a 90%, by weight, averaged over 3 consecutive hours, by the A32 Selective Catalytic Reduction (SCR) Unit; or
- c. For a period when UPI is running a thin gauge coil (<0.0300 inch) at a heat input level less than 50 kscf/hr, NO<sub>x</sub> shall be reduced by at least 8280%, by weight, averaged over three consecutive hours, by the A32 Selective Catalytic Reduction (SCR) Unit. If the duration of the thin gauge run low heat input run is less than three hours, the averaging period shall be the entire run period.
- d. For a period when UPI is running at a heat input level less than 50 kscf/hr, NO<sub>x</sub> shall not exceed 18 ppmv at 3% oxygen averaged over 3 consecutive hours. If the duration of the low heat input run is less than three hours, the averaging period shall be the entire run period.

(Basis: BACT, Cumulative increase)

5. Pursuant to Regulation 1, Section 522.7, the owner/operator of S-174 shall report any indicated excess of part F.4.a. to the APCO within 96 hours after such occurrence. The report shall include the nature, extent, and cause of the indicated excess. (Basis: 1-522.7)

#### K. PM10 Source Testing

3. In order to demonstrate compliance with each PM10 concentration and mass emission rate limits in the above parts B through E, and G and H of this condition, the owner/operator shall perform District approved source tests:

- a. in calendar year 2004 except in calendar year 2006 for S176.

b. in every fifth calendar year thereafter.

The owner/operator shall notify the Manager of the District's Source Test Section at least seven (7) days prior to the test, to provide the District staff the option of observing the testing. (basis: Regulation 2-6-503)

Condition 7579 was modified through AN 19114 in response to revision to ATCM for Chromium Plating and Chromic Acid Anodizing effective on 10/24/07. See appendix for AN 19114 for more explanation.

### **Condition # 7579**

For S82, 93, 155 - ELECTRO-TINNING LINES:

Application 18718 (September 2008): Addition of HEPA Filters to A-41 and A-42 Mapco Enforcer III Units. The owner/operator shall comply with the following Conditions for Sources 82, 93 and 155 Chrome Plating Tanks. Basis refers to either BAAQMD Regulations/Rules or California Code of Regulations, Title 17, Section 93102 - 93102.16 and associated appendices, unless otherwise noted.

#### 1. Throughput

~~The total annual combined throughput at sources S82, S93, and S155 shall not exceed 114.5 million amp-hr in any consecutive twelve-month period.  
(Basis: Voluntary Limit)~~

#### 2. Abatement

~~This source shall not be operated unless emissions are vented to either A41 or A42, Mapco Enforcer III High Efficiency Scrubber.  
(Basis: Regulation 11-8, Section 93102 (e)(2))~~

#### 3. Emission Limits

~~Emissions of hexavalent chromium shall not exceed 0.006 mg/amp-hr after abatement.  
(Basis: Regulation 11-8, Section 93102 (e)(2))~~

#### 4. Source Test

~~Source Testing Protocol: A written source test protocol shall be submitted for District approval prior to conducting any source test for compliance. This source test protocol shall include testing methods, length of sample period, sampling equipment and methods, as well as the planned date for the source test.  
(Basis: Regulation 11-8, Section 93102 (d)(4))~~

#### 5. Record Keeping



~~To comply with the above parts, monthly records of current applied to this source integrated over time, in units of amp-hrs, and records of chemical addition to the source shall be kept (onsite) and maintained. Such records shall be submitted to the BAAQMD on an annual basis via the annual update program. These records shall be maintained at the plant site for at least five years. (Basis: Regulation 11-8, Section 93102(h)(4)(A))~~

~~6. In order to demonstrate compliance with the emission limit in part 3, the owner/operator of this equipment shall conduct District approved source testing of both scrubber systems every two years. The initial source test required by this part shall be conducted no later than July 1, 2004. Subsequent testing shall be performed no later than 24 months from the previous test. The Director of the Compliance and Enforcement Division of the District shall be contacted to obtain approval of the source test procedures at least 14 days in advance of each source test. The Director of the Compliance and Enforcement Division shall be notified of the scheduled test date at least 7 days in advance of each source test. The source test report shall be submitted to the Compliance and Enforcement Division and to the Director of the Compliance and Enforcement Division within 45 days of the test date. (basis: Regulation 2-1-304)~~

1. Performance Standards

a. Emission Limits effective through 10-23-2009:

Emissions of hexavalent chromium shall not exceed 0.006 mg per ampere-hour (mg/amp-hr) after abatement. [Basis: 93102.4(a)(1)]

b. Emission Limits effective 10-24-2009:

Emissions of hexavalent chromium shall not exceed 0.0015 mg per ampere-hour (mg/amp-hr) after abatement. [Basis: 93102.4(b)(1)]

c. Throughput: The total annual combined throughput at S82, S93, and S155 shall not exceed 114.5 million ampere-hours in any consecutive 12-month period. [Basis: 93102.4(b)(1)]

d. The requirements of Parts 1a and 1b of this condition and the O&M Plan provisions do not apply during periods of equipment breakdown, provided the provisions of the District's breakdown rules are met. [Basis: 93102.2(b)]

2. Abatement

a. The owner/operator shall abate at all times during operation of S82, S93, and S155 with plating tank emissions vented through A41 and/or A42. A41 and A42 are identified as Mapco Enforcer III Scrubber units with HEPA filtration elements.

The ventilation and abatement system shall be properly maintained and kept in good working condition.

3. Source Test

- a. The owner/operator shall perform a source test by October 24, 2009 to demonstrate compliance with the emission performance standard specified in part 1b.

An existing District-approved source test may be used to demonstrate compliance with this part, as long as the existing source test was conducted in accordance with ATCM Section 93102.7(b) & (c). [Basis: 93102.7(a)(1)(A)]

- b. The owner/operator shall perform source tests to demonstrate compliance according to the following schedule:

- 1) Unless Part 3.b)ii. is satisfied, subsequent source testing shall be performed no later than 36 months after the date of the previous District-approved source test demonstrating compliance.
- 2) If the previous two consecutive source tests demonstrate compliance, the subsequent tests shall be performed no later than 48 months after the previous source test.
- 3) If a source test demonstrates non-compliance, then the owner/operator must perform another source test to demonstrate compliance. Subsequent source tests to demonstrate compliance shall be performed no later than 24 months after the previous source test. If after two consecutive source tests at the 24 month frequency, both of which demonstrate compliance, the source test frequency reverts to the original schedule in Part 3.b)i.

- c. Non-compliant source test: After conducting a source test which demonstrates non-compliance the owner/operator shall review and adjust or repair the plating operation and associated emission control system. A source test to demonstrate compliance shall be performed no later than 30 days after the chrome plating system adjustments/repairs are completed.

- d. Any chrome plating bath that is non-operational at the time a source test is due does not have to be tested at that time. Upon subsequent start-up of any such bath, a source test shall be conducted within 30 days.

- e. Source Testing Protocol: A written source test protocol based on 93102.7© shall be provided for District approval prior to conducting any source test for compliance. This source testing protocol shall include testing methods, length of sample period, plating facilities to be operated during the source test, sampling equipment and methods, as well as the planned date for the source test.

For the purpose of maintaining ongoing compliance, the following parameters shall be monitored and recorded at the listed frequency during the source testing period:

- 1) A41 & A42 Mapco Scrubber unit(s): record pressure drop at least one time every 15 minutes of operation.
- 2) A41 & A42 HEPA filter elements: record pressure drop at least one time every 15 minutes of operation.

f. The owner/operator shall contact the District Source Test Section at least 14 days in advance of the source test or as directed by the ATCM to obtain approval of the test protocol. The owner/operator shall notify the District Source Test Section at least 7 days in advance of each scheduled source test. [Basis: 93102.7]

4. Training

No later than October 24, 2009, and within every two calendar years thereafter, the owner or operator shall ensure that hexavalent chrome based plating operations (including environmental compliance/recordkeeping) are under the direction of the owner or operator or current employee who is onsite and has completed the ARB Compliance Assistance Training Course for chrome plating and anodizing. [Basis: 93102.5(b)]

Chrome plating operations during the physical absence of the trained owner or operator are permissible as long as the trained individual(s) are physically based at the facility and are directly involved in the day to day environmental practices and requirements associated with the chrome plating operation.

5. Housekeeping

The following housekeeping requirements shall be implemented to reduce potential hexavalent chrome fugitive emissions: [Basis: 93102.5©]

- a. Chromic acid materials shall be stored in a closed container in an enclosed storage area.
- b. Chromic acid materials shall be transported from storage to the bath in a closed container.
- c. Any liquid or solid hexavalent chrome containing material that is spilled shall be contained or cleaned up within one hour after being spilled.
- d. Surfaces within the chrome storage area and the walkways and other areas potentially contaminated with hexavalent chrome, shall be cleaned at least one time every seven days by either HEPA vacuuming, damp cloth hand wiping, wet mopping, use of non-toxic dust suppressants or any other District-approved method.
- e. Chromium containing wastes generated as a result of any of the above housekeeping activities shall be stored, disposed of, recovered, or recycled using practices that minimize fugitive dust.

6. Monitoring

- a. Each rectifier shall be hard-wired to a single non-resettable meter which records ampere-hours continuously during rectifier operation. Each ampere-hour meter shall be installed and maintained per manufacturer's specifications. The owner/operator shall record the total ampere-hours used during each month. [Basis: 93102.10(a), 93102.12(c)(1)]

b. A41/A42 Mapco Scrubber Pressure Drop: The owner/operator shall continuously monitor the pressure drop across A41 and A42 Mapco Enforcer III Scrubber unit. The pressure drop shall be maintained within plus or minus 2 inches of water of the value established during the most recent source test to demonstrate compliance with the emission limitations of Part 1. Pressure drop readings shall be recorded at a frequency of at least one time per operating week. [Basis: 93102.9(b), 9102.12(c)(2)]

c. A41/A42 HEPA Filter Element Pressure Drop: The owner/operator shall continuously monitor the pressure drop across A41 and A42 HEPA filter elements. The pressure drop shall be maintained within minus ½ times to +2 times the inches of water of the value established during the most recent source test to demonstrate compliance. Pressure drop readings shall be recorded at a frequency of at least one time per operating week. [Basis: 93102.9(b), 93102.12(c)(2)]

#### 7. Operation & Maintenance (O&M) Plan

The owner/operator shall prepare an operation and maintenance plan for the chrome plating operation, which shall be retained onsite and made available for inspection upon request. Any revisions to the O & M Plan shall be documented in an addendum and all versions shall be maintained for a period of 5 years after each revision to the plan. The O&M Plan shall at a minimum include:

a. The inspection and maintenance requirements for the air pollution control equipment and amp-hr meters/totalizers. [Basis: 93102.11]

b. A checklist to document the inspection, operation and maintenance for the chrome plating operation, including steps to be taken to correct operating deficiencies. [Basis: 93102.11]

#### 8. Inspection & Maintenance Frequency

a. The owner/operator shall perform visual inspections of the abatement systems and associated ductwork pursuant to ATCM Section 93102.10(a) at least once per calendar quarter and conduct wash downs of the Mapco Enforcer III unit per manufacturer recommendations. [Basis: 93102.10(a) and Reg 2-5]

b. In order to demonstrate compliance with Part 8a, the owner/operator shall record the equipment being inspected, date, brief description of the working condition of the device during the inspections, any maintenance activities performed on the components of the air pollution control systems, and any actions taken to correct deficiencies found during the inspection.

#### 9. Recordkeeping

The owner/operator shall maintain the following records for at least five years, with the most recent two years maintained onsite.

a. Inspection Records to demonstrate that such inspections were done in accordance with the provisions of Section 93102.10 and the O&M Plan. Such records can take the form

of a checklist and shall identify the devices inspected, the date and time of the inspection, a brief description of the working condition and any corrective actions.

b. The owner/operator shall:  
[Basis: 93102.12]

1) Record monthly and cumulative 12-month rectifier ampere-hour totals, and  
2) Record the pressure drop across the abatement device(s) at least once per operating week.

c. Breakdown Records noting the occurrence, duration, cause (if known), and action taken.

d. Records of excesses of the emission limitations set forth in Part 1 or the monitoring parameters established under Part 6 noting any exceedances of the ampere-hour throughput or pressure drop limits.

e. Housekeeping Records demonstrating compliance with Part 3, above, including date and time of housekeeping activity.

#### 10. Reporting

a. Source Test Reports: The owner/operator shall report source test results used to demonstrate compliance to the District Source Test Section no later than 60 days after the test date. The content of the source test reports shall contain the information identified in Appendix 1 of the applicable ATCM. Source test records shall be maintained onsite at the facility and made available to the District upon request, for a period of 5 years from the date of the source test. [Basis: 93102.13(a)]

b. Annual Compliance Status Report: The owner/operator shall submit an annual compliance status report to the District on or before February 1, and shall include the following information for the preceding calendar year.

The content of the ongoing status shall include the information identified in Appendix 3 of the applicable ACTM. The report shall contain the name, title and signature of the responsible official who is certifying the accuracy of the report. [Basis: 93102.13(c)]

BAAQMD Condition 12194 is revised since BAAQMD Condition 20781 is not being applied to Sources 286 and 287. Because these sources are each abated by a demister and not a wet scrubber, BAAQMD Condition 20781 is not appropriate. Only the revised heading for BAAQMD Condition 20781 is shown below since the condition text is not changed. The addition of monitoring to BAAQMD Condition 12194 is what is appropriate for an evaporator abated by a demister.

#### **Condition # 12194**

For S286, 287 - CHROME RECOVERY UNIT (CRU) EVAPORATORS

1. The Owner/Operator shall ensure that the tTotal combined emissions of hexavalent chromium from chrome recovery unit evaporators S286 and S287, ~~shall not do not~~ exceed 0.87 lb in any consecutive twelve month period. The ventilation and exhaust systems, including A43 #1 CRU Evaporator Mist Eliminator and A44 #2 CRU Evaporator Mist Eliminator, shall be properly maintained and kept in good operative condition.

(Basis: Toxic Risk Screen)

2. To demonstrate compliance with part 1, above, a District-approved source test shall be performed (according to an approved protocol) on the evaporator system. The owner/operator of this equipment shall conduct District approved source testing of both ~~evaporator scrubber~~ systems every two years. The initial source test required by this part for each source shall be conducted the later of July 1, 2004 or within six months of any operation occurring on or after the Major Facility Review Permit issuance date. Subsequent testing shall be performed no later than 24 months from the previous test.

The Owner/Operator shall ensure that tThis source test ~~shall be~~ conducted according to the requirements of either CARB Method 425 or EPA Method 306. This source test shall determine the mass emissions of both total and hexavalent chromium in units of g/hr and mg/dscm as emitted after abatement. A complete report shall be submitted within 45 days of the test date to the Director of the Compliance and Enforcement Division and shall demonstrate compliance with part 1, above.

Source Testing Protocol: A written source test protocol shall be submitted at least 14 days in advance of each source test to the Director of the Compliance and Enforcement Division for District approval prior to conducting any source test for compliance. This source test protocol shall include testing methods, length of sample period, facilities to be operated during the source test, parameters to be monitored during the source test, sampling equipment and methods, as well as the planned date for the source test. The Director of the Compliance and Enforcement Division shall be notified of the scheduled test date at least 7 days in advance of each source test.

(Basis: Toxic Risk Screen)

### 3. Ongoing Compliance Monitoring

a. To demonstrate ongoing compliance with part 1, above, ~~the Owner/Operator USS-Posco~~ shall keep monthly records of hexavalent and total chrome emissions. Emissions of total and hexavalent chrome shall be estimated by multiplying the chrome emission rates in grams per hour as determined by the source test required in part 2, by the monthly evaporator system hours of operation.

b. Within three months of any operation occurring on or after May 1, 2006, the Owner/Operator shall ensure that each CRU Evaporator is equipped with devices to measure the temperature and pressure of the liquid stream to be sprayed. The measurement shall be made downstream of any heater, control valve and shutoff valve but upstream of any spray nozzle. Within six months of any operation occurring on or after May 1, 2006, the acceptable range for temperature and pressure of the liquid stream to be sprayed shall be recorded for each CRU Evaporator and kept on file. Thereafter, each CRU Evaporator shall be operated within the range of normal operating parameters for the equipment as established by the facility.

c. Within three months of any operation occurring on or after May 1, 2006, the Owner/Operator shall ensure that each mist eliminator is equipped with devices to measure the gas stream pressure across the mist eliminator. Within six months of any operation occurring on or after May 1, 2006, the acceptable range for gas stream pressure across the mist eliminator shall be recorded for each mist eliminator and kept on file. Thereafter, each mist eliminator shall be operated within the range of normal operating parameters for the equipment as established by the facility.

d. In order to ensure the proper operation of each CRU evaporator and mist eliminator, the following items shall be inspected on at least a monthly basis.

i. operating parameters including liquid stream temperature and pressure and gas stream pressure drop (following the installation of monitoring equipment in accordance with part 2)

ii. evidence of visible particulate emissions from the exhaust of the mist eliminator  
(Basis: Toxic Risk Screen, Regulation 2-1-403)

#### 4. Evaporator System Hours of Operation

To comply with part 3, above, the Owner/Operator USS Poseo shall install, maintain, and utilize a non-resettable clock on the evaporators to track and record the hours of operation.  
(Basis: Toxic Risk Screen)

#### 5. Recordkeeping

a. In order to demonstrate compliance with part 3, the permit holder shall keep monthly inspection records for each affected CRU Evaporator with mist eliminator in a District approved log. These records shall include the following information for each unit inspected:

i. the time and date of each inspection

ii. the name of the person conducting the inspection

iii. the liquid pressure versus the established range

iv. the liquid temperature versus the established range

v. the measured gas stream pressure drop versus the established pressure drop range

vi. the results of each visible particulate emissions check

vii. any corrective action taken as a result of the inspection

a. Source Test Results: the Owner/Operator USS Poseo shall keep and maintain onsite records of all source tests performed on the exhaust stream for sources S286 and S287.

b. Hours of Operation: the Owner/Operator USS Poseo shall keep and maintain onsite records of monthly hours of operation of the chrome recovery unit evaporator system.

Retention of Records: All of the above records shall be maintained for at least five years following the close of the recording year.

(Basis: Toxic Risk Screen)



BAAQMD Condition 13634 was revised to remove references to Source 289, Continuous Galvanize Line Stenciller, which has been shut down (closed). This is a minor revision.

**Condition # 13634**

For ~~S289 and~~ 290 - Continuous Galvanize Line Stenciller:

1. The Owner/Operator shall ensure that the Combined usage of ink and cleanup solvent at ~~sources S289, and S290~~ doesshall not exceed the following limits, in any calendar year:

- a. Matthews JAM-4013 Black Ink 900 gallons
  - b. Pannier #1001 Black Ink 60 gallons
  - c. Marsh T-Grade Dye 5 gallons
  - d. Matthews JAM-4500 Cleaner 60 gallons
  - e. Pannier 1060 Solvent 180 gallons
- (Basis: Cumulative increase)

2. Inks and solvents other than the materials specified in part 1 may be used at ~~sources S289 and S290~~, provided that the Owner/Operator Permit Holder can demonstrate that both of the following are satisfied:

- a. Total ~~combined~~ POC emissions from ~~S289 and S290~~, do not exceed 7800 pounds per calendar year; and
  - b. The use of these materials does not increase toxic emissions above any risk screening trigger level.
- (Basis: Cumulative increase, risk management policy)

3. To determine compliance with the above conditions, the Owner/Operator Permit Holder shall maintain the following records and provide all of the data necessary to evaluate compliance with the above parts, including the following information:

- a. Type and quarterly usage of all POC containing materials used;
- b. If a material other than those specified in part 1 is used, POC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with part 2, on a quarterly basis;

The Owner/Operator shall ensure that aAll records ~~shall beare~~ retained on-site for five years, from the date of entry, and made available for inspection by District staff upon request.  
(Basis: Cumulative increase, risk management policy)

4. The cumulative emission increase for this application is 6189.6 lb/yr POC. This increase is partially offset by contemporaneous emission reductions totaling 4400.2 lb/yr POC. The remaining balance of 1789.4 lb/yr (0.895 TPY) is offset at a ratio of 1.15:1.0 with 1.03 TPY of NOx credits from Banking Certificate No. 490. If UPI wishes to reduce the emission limit of 7800 lb/yr in part 2a, the District will refund the corresponding NOx emission credits that were used to offset this application, less the 15% incremental offset ratio, up to a total of 0.895 TPY. If the Owner/Operator Permit Holder can demonstrate that emissions from ~~S289, 290, and 291~~ never reached 7800 lb/yr, the District will also refund the 15% incremental offset ratio, based on the difference between highest actual emissions and 7800 lb/yr.



(Basis: Cumulative increase)

BAAQMD Condition 20038 is changed to remove references to Source 401, Contaminated Soils – (CAMU) “In,” which has been shut down (closed). This is a minor revision.

### **Condition # 20038**

For S400 - CONTAMINATED SOILS (SWMUS) “OUT” ~~AND S401 - CONTAMINATED SOILS (CAMU) “IN”~~:

#### GENERAL

1. The owner/operator shall perform the remediation project in accordance with the "California Environmental Quality Act Initial Study for USS-POSCO Industries Soil Remediation/Unit I Corrective Action Management Unit, Pittsburg, California," dated June 2002. The Department of Toxic Substances Control (DTSC) prepared this document. Specific mitigation measures required by the BAAQMD include the "Mitigation Measures During Remedial Activity" contained in Section IV, Environmental Impact Analysis, Part 3, Air Quality, except the BAAQMD does not:

- a. require the use of a safety officer.
- b. limit personnel entrances into excavations.
- c. limit access to construction area(s) to approved personnel with adequate protective equipment.
- d. require air-monitoring equipment.

(basis: CEQA)

#### FUGITIVE PARTICULATE AND VISIBLE EMISSIONS

2. The owner/operator shall ensure that visible dust emissions from any operation of this project shall not exceed 0.5 on Ringelmann chart, for a period or periods aggregating more than 3 minutes in any hour. The owner/operator shall also ensure that dust emissions shall not result in fallout on non-USS-POSCO-owned adjacent property in any quantities as to cause annoyance to any person, or public nuisance per Regulation 1-301. This part shall not apply to an emission from an engine used to propel a motor vehicle.

(basis: BACT, Regulation 1-301)

3. The owner/operator shall ensure that trucks hauling material on-site are covered, and/or maintain a two-foot minimum freeboard, and/or have the top layer watered. If any one of these abatement techniques is not effective to comply with part #2, then the District will require additional control measures as deemed necessary by the District. (basis: BACT)

4. The owner/operator shall retain the following records in a District approved logbook. These records shall be kept on site for a period of at least 5 years from the date on which a record is made, and shall be made available to the District staff for inspection.

(basis: Cumulative increase }

- a. Daily hours of operation at each Solid Waste Management Unit (SWMU).
- b. Daily amount of material placed into a stockpile(s) at each SWMU.

- c. Daily throughput of material removed from each SWMU
- ~~d. Daily amount of material received at the Corrective Action Management Unit (CAMU).~~
- ~~e. Daily number of trucks used to haul material from a SWMU to the CAMU.~~
- df. Daily number of trucks used to haul material from a SWMU to an off-site location.

BAAQMD Condition 20666 is added as explained in the engineering evaluation for Application 10174. This is a minor revision.

**Condition #20666**

1. The OPW EVR Phase I Vapor Recovery System, including all associated plumbing and components, shall be operated and maintained in accordance with the most recent version of California Air Resources Board (CARB) Executive Order VR-102. Section 41954(f) of the California Health and Safety Code prohibits the sale, offering for sale, or installation of any vapor control system unless the system has been certified by the state board. (District Regulation 8-7-301.2)
2. The owner or operator shall conduct and pass a Rotatable Adaptor Torque Test (CARB Test Procedure TP201.1B) and either a Drop Tube/Drain Valve Assembly Leak Test (TP201.1C) or, if operating drop tube overfill prevention devices ("flapper valves"), a Drop Tube Overfill Prevention Device and Spill Container Drain Valve Leak Test (TP201.1D) at least once in each 36- month period. Measured leak rates of each component shall not exceed the levels specified in VR-102. Results shall be submitted to BAAQMD within 15 days of the test date in a District-approved format. (District Regulation 8-7-301.2)

Condition 20780 is revised so that it no longer applies to sources 178, 179, and 182 that are now specifically regulated in CAM condition 25311.

**Condition #20780**

General Conditions for Sources Abated by Baghouses/Dust Collectors: S97, S134, S166, S167, S168, and S176, S178, S179, S182

1. The Owner/Operator shall ensure that eEach baghouse/dust collector is~~shall be~~ properly maintained and properly operated at all times that its associated PM emissions source(s) is/are in operation. (basis: Regulation 2-1-403)
2. The Owner/Operator shall ensure that wWithin 6 months of the issuance of the Title V permit, each baghouse/dust collector shall beis equipped with a magnahelic gauge or other approved device to measure the pressure drop across the filter bags. The pressure drop across the baghouse/dust collector shall be maintained within the range recommended by the manufacturer or normal operating range established by the facility. The established pressure drop range for each baghouse/dust collector shall be recorded and kept on file. (basis: Regulation 2-1-403)

3. In order to ensure the proper operation of each affected baghouse/dust collector, the Owner/Operator shall ensure that the following items ~~shall be~~ inspected on at least a monthly basis. (basis: Regulation 2-1-403)
  - a. the measured pressure drop across the baghouse/dust collector is within the established pressure drop range
  - b. evidence of visible particulate emissions from the exhaust of the baghouse/dust collector
4. If a baghouse/dust collector is found to be operating outside of the established pressure drop range or if there is evidence of visible particulate emissions from the exhaust of the baghouse/dust collector, the Owner/Operator shall conduct a visual inspection of the filter bags ~~shall be conducted~~. Filter bags exhibiting holes, tearing, or significant wear shall be replaced. After any corrective action has been taken, the baghouse/dust collector shall be re-inspected in accordance with part 3. (basis: Regulation 2-1-403)
5. In order to demonstrate compliance with parts 3 and 4, the Owner/Operator permit holder shall keep monthly inspection records for each affected baghouse/dust collector in a District approved log. These records shall include the following information for each baghouse/dust collector:
  - a. the time and date of each inspection
  - b. the name of the person conducting the inspection
  - c. the measured pressure drop versus the established pressure drop range
  - d. the results of each visible particulate emissions check
  - e. the observed condition of the filter bags when a visual inspection is performed
  - f. any corrective action taken as a result of the inspection

All records shall be kept on-site and made available for District inspection for a period of five years from the date on which a record is made. (basis: Regulation 2-6-501)

Condition 20781 is not being applied to Sources 286 and 287 because these sources are each abated by a demister and not a wet scrubber. Condition 20780 is revised so that it no longer applies to S182 that is now specifically regulated in CAM condition 25311.

### **Condition #20781**

General Conditions for Sources Abated by Wet Scrubbers: S169, S173, S177, S180, and S181 ~~through S182, S286, S287~~

1. The Owner/Operator shall ensure that ~~e~~Each wet scrubber ~~shall be~~ properly maintained and properly operated at all times that its associated PM emissions source(s) is/are in operation. (basis: Regulation 2-1-403)
2. The Owner/Operator shall ensure that ~~w~~Within 9 months of the issuance of the Title V permit, each wet scrubber ~~shall be~~ equipped with devices to measure the ~~scrubber~~ liquid flow rate and the gas stream pressure drop across the scrubber. If a demister is downstream of a scrubber, the Owner/Operator may consider the demister to be part of the wet scrubber

and measure the gas stream pressure drop across the scrubber plus demister. Within 12 months of the issuance of the Title V permit, the acceptable ranges for scrubber liquid flow rate and gas stream pressure drop across the unit shall be recorded for each affected wet scrubber and kept on file. Thereafter, each scrubber shall be operated within the range of normal operating parameters for the equipment as established by the facility. (basis: Regulation 2-1-403)

3. In order to ensure the proper operation of each affected wet scrubber, the Owner/Operator shall ensure that the following items shall be inspected on at least a monthly basis. (basis: Regulation 2-1-403)
  - a. scrubber operating parameters including liquid flow rate and gas stream pressure drop (following the installation of monitoring equipment in accordance with part 2)
  - b. evidence of visible particulate emissions from the exhaust of the scrubber
4. In order to demonstrate compliance with part 3, the Owner/Operator permit holder shall keep monthly inspection records for each affected wet scrubber in a District approved log. These records shall include the following information for each unit inspected:
  - a. the time and date of each inspection
  - b. the name of the person conducting the inspection
  - c. the liquid flow rate versus the established range
  - d. the measured gas stream pressure drop versus the established pressure drop range
  - e. the results of each visible particulate emissions check
  - f. any corrective action taken as a result of the inspection

All records shall be kept on-site and made available for District inspection for a period of five years from the date on which a record is made. (basis: Regulation 2-6-501)

BAAQMD Condition 20866 is changed to remove references to Source 304, 300 through 310, and 311 since these sources have been archived.

**Condition #20866**

For S190, S195, S202, S206, S210, AND S215 - COLD CLEANERS  
S304, S305, S308, and S300 through S311, Solvent Cold Cleaners, System One, Model 570, 35 Gal  
S317, Cold Cleaner, Inland Technology, Model IT48WC, 42 Gal and S312, Solvent Cleaner, ZEP,  
Model 9066, 45 Gal

1. The Owner/Operator of Cold Cleaners S190, S195, S202, S206, S210, S215, S304, S305, S308, and S311, and S317s S300 through S312 shall not exceed the following usage limits for each cleaners for each cleaner during any consecutive twelve-month period:

Methylated Siloxane      40 gallons/year/cleaner  
(Basis: Cumulative Emissions)

2. The Owner/Operator of sources S190, S195, S202, S206, S210, S215, S305, S308, S311, and S317 S 304, S 305, S308 and S300 through S311S312 may use solvent other than the material specified in Part 1 above, and/or usages in excess of those specified in Part 1 above, provided that the Owner Operator can demonstrate that all of the following are satisfied:
  - a. ~~a. — S190, S195, S202, S206, S210, S215, S304, S305, S308, and S300 through S311, and S317S312~~ Cold Cleaners comply with Regulations 8-16-303.4 and 8-16-303.5;
  - b. The total NPOC combined emissions from S190, S195, S202, S206, S210, S215, S304, S305, S308, and S300 through S311, and S317S312 do not exceed 3,1604108 pounds in any consecutive twelve-month period; and
  - c. The use of these materials does not increase toxic emissions above any risk screening trigger level.(Basis: Cumulative Emissions)
3. To determine compliance with the above conditions, the Owner/Operator shall maintain the following records and provide all of the data necessary to evaluate compliance with the above conditions, including the following information:
  - a. Quantities of solvent used at each source on a monthly basis.
  - b. If a material other than that specified in Part 1 above is used, NPOC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Part 2, on a monthly basis,
  - c. Monthly usage and/or emission calculations shall be totaled for each consecutive twelve-month period.(Basis: Cumulative Emissions)

BAAQMD Condition 12997 was changed to lower the permitted gasoline throughput limit at the request of USS-POSCO and renumbered to 24278 and the basis for the condition was changed to voluntary. This is a minor revision.

**Condition # ~~12997~~24278**

For S158 (G6331) - GASOLINE DISPENSING ISLAND

Pursuant to BAAQMD Toxic Section policy, The Owner/Operator shall ensure that this facility's annual gasoline throughput ~~does~~shall not exceed ~~1.01 million~~26,107 gallons in any consecutive 12 month period.

(Basis: ~~toxic risk screen~~Voluntary Limit)

Condition 25272 is added for S402 permitted through AN 24291 on 7/16/12.

**Condition # 25272**

For S402 – Horizontal Electrostatic Coil Oiler

1. The owner/operator of S-402 shall not exceed 36,500 gallons of Steel Shield 6299 coating oil in any consecutive 12 month period. (Basis: Cumulative Increase)

2. The owner/operator of S-402 may use coatings other than the material specified in part 1, and/or usages in excess of those specified in part 1, provided that they can demonstrate that all of

the following are satisfied:

- a. Total POC emissions do not exceed 0.383 tons in any consecutive twelve month period; and
  - b. Total NPOC emissions do not exceed 0.383 tons in any consecutive twelve month period; and
  - c. The use of these materials does not increase toxic emissions above any risk screening trigger levels. (Basis: Cumulative Increase, Emission Offsets, Toxic Risk Screen)
3. The owner/operator of S-402, to determine compliance with parts 1 and 2, shall maintain the following records and provide all of the data necessary to evaluate compliance with the above parts. Records include the following information:
- a. Type and monthly usage of all POC containing materials used
  - b. Type and monthly usage of all NPOC containing materials used
  - c. If a material other than those specified in part 1 is used, POC/NPOC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with part 2, on a monthly basis
  - d. Monthly usage and/or emission calculations shall be totaled for each consecutive twelve-month period. All records shall be retained on-site for five years, from the date of entry, and made available for inspection by District staff upon request. These recordkeeping requirements shall not replace the recordkeeping requirements contained in any applicable District Regulations. (Basis: Cumulative Increase, Emission Offsets, Toxic Risk Screen)

Condition 25311 is added as the CAM permit condition for S178, S179, and S182.

**Condition # 25311 Compliance Assurance Monitoring (CAM) Permit Condition**

For the following sources:

**S178 Iron Oxide, Silo #1, S179 Iron Oxide Bagging Station, and S182 Iron Oxide, Silo #2**  
abated by

**A34 Venturi Scrubber, A35 Silo #2 Baghouse, A38 Silo #1 Baghouse, and A40 Iron Oxide/HCL Plant Demister**

1. The Owner/Operator shall use BAAQMD Manual of Procedures Volume I, Modified Method 9 to conduct visible emission on the above sources and their associated abatement devices at least once every week to ensure compliance with BAAQMD Regulation 6-1-301 [Basis: Regulation 6-1-601];
2. The following definitions apply to the Compliance Assurance Monitoring plan for the source with associated abatement device mentioned above to assure compliance with BAAQMD Regulation 6:
  - a. Exceedance is defined as any of the following events:

- (1) A pressure drop across A34 in inches of water column that is less than 6.0 inches or greater than 25.0 inches, or a scrubbing liquid flow rate that is less than 500 gallons or greater than 1000 gallons
    - (2) A pressure drop across A35 in inches of water column that is less than 1.0 inches or greater than 4.0 inches
    - (3) A pressure drop across A38 in inches of water column that is less than 1.0 inches or greater than 4.0 inches
    - (4) A pressure drop across A40 in inches of water column that is less than 0.0 inches or greater than 2.0 inches.
  - b. Excursion is defined as any 1 minute differential pressure manometer reading that meets the definition of exceedance. [Basis: 40 CFR Part 64.6(c)(2)]
3. The Owner/Operator shall equip A34, A35, A38, and A40 with differential pressure manometer gauges that measure the pressure drop across the abatement devices in inches of water column. The gauge shall have a minimum accuracy of 0.5 inches water column. The Owner/Operator shall equip A34 with a liquid flow meter that measures the liquid flow rate across A34 [Basis: 40 CFR Part 64.6(c)(1), 40 CFR Part 63.1350(m)(6)(iii)]
4. The indicator ranges that assure no visible emissions from the above sources and their associated abatement devices shall be
  - a. Pressure drop 6.0 to 25.0 inches of water column across A34
  - b. Scrubbing liquid flow rate 500 to 1000 gallons per minute through A34
  - c. Pressure drop 1.0 to 4.0 inches of water column across A35
  - d. Pressure drop 1.0 to 4.0 inches of water column across A38
  - e. Pressure drop 0.0 to 2.0 inches of water column across A40[Basis: 40 CFR Part 64.4(a)]
5. The owner/operator of A34, A35, A38, and A40 shall take readings of the differential pressure manometers and liquid flow meter installed pursuant to Part 4 manually at least once per day. The pressure and liquid flow rate readings shall be recorded in a District-approved log on a weekly basis. [Basis: 40 CFR Part 64.3(b)(4)(iii)]
6. If an exceedance occurs at a manometer or a liquid flow rate meter installed at A34, A35, A38, or A40, the owner/operator shall determine the cause of the exceedance and if necessary restore operation of the above sources and their associated abatement devices to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. USS-POSCO must review the procedures used in response to an excursion or exceedance. If exceedances continue to occur, the District may require the owner/operator to develop and implement a Quality Improvement Plan (QIP). [Basis: 40 CFR Parts 64.6(c)(3), 64.7(d)(2), 64.8]
7. The manometer gauges and liquid flow rate meter installed at A34, A35, A38, and A40 shall be visually inspected prior to use and the owner/operator shall insure that the gauges and meter are calibrated on a quarterly basis. [Basis: 40 CFR Part 64.3(b)(3)]



8. The owner/operator of the above sources and their associated abatement devices shall submit a monitoring report to the District in accordance with 40 CFR Part 70.6(a)(3)(iii). The report shall include all of the following information:
  - a. Summary information on the number, duration, and cause of excursions or exceedances and the corrective actions taken.
  - b. Summary information on the number, duration, and cause for monitor downtime incidents  
[Basis: 40 CFR Part 64.6(c)(3) and 40 CFR Part 64.9(a)(2)]
9. The owner/operator shall inspect A34, A35, A38, and A40 based on the manufacturer's recommendations on a yearly basis. The owner/operator shall keep a record of all yearly inspections and any corrective action taken. (Basis: 40 CFR Part 64.6(c)(1)(iii))
10. The owner/operator shall keep the records of the pressure drops, scrubbing liquid flow rates, visible emission readings, calibrations, test results, excursions and exceedances required by the above conditions for at least 5 years and shall make the records available to District staff upon request. [Basis: Regulation 2-6-501 Recordkeeping]

## **VII. Applicable Limits and Compliance Monitoring Requirements**

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

The District has reviewed all monitoring and has determined the existing monitoring is adequate with the following exceptions.

The tables below contain only the limits for which there is no monitoring or inadequate monitoring in the applicable requirements. The District has examined the monitoring for other limits and has determined that monitoring is adequate to provide a reasonable assurance of compliance. Calculations for potential to emit will be provided in the discussion when no monitoring is proposed due to the size of a source.

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) whether there is some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.



These factors are the same as those historically applied by the District in developing monitoring for applicable requirements. It follows that, although Title V calls for a re-examination of all monitoring, there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. It is possible that, where a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still be appropriate in the Title V permit if, for instance, there is little likelihood of a violation. Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring requirements only when it can support a conclusion that existing monitoring is inadequate.

**SO<sub>2</sub> Sources**

<b>S# &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S70, Annealing Furnace; S174, KM Continuous Annealing Furnace; S177, Iron Oxide Production Roaster; S293, Emergency Standby Diesel Generator-TWTP; S294, Emergency Standby Diesel Generator- KMCAL; S295, Emergency Standby Diesel Generator- Filter Plant; S296, Standby Diesel Generator- #2 CC Line; S297, Emergency Standby Diesel Generator- Computer Bldg; S299, Diesel Fire Pump Packaged System	BAAQMD 9-1-301	Ground level concentrations of SO <sub>2</sub> shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours	None
S70, Annealing Furnace; S174, KM Continuous Annealing Furnace; S177, Iron Oxide Production Roaster	BAAQMD 9-1-302	300 ppm (dry)	None

**SO<sub>2</sub> Discussion:**

**BAAQMD Regulation 9-1-301**

Area monitoring to demonstrate compliance with the ground level SO<sub>2</sub> concentration requirements of Regulation 9-1-301 is at the discretion of the APCO (per BAAQMD Regulation 9-1-501). This facility does not have equipment that emits large amounts of SO<sub>2</sub> and therefore is not required to have ground level monitoring by the APCO.

All facility combustion sources are subject to the SO<sub>2</sub> emission limitations in District Regulation 9, Rule 1 (ground-level concentration and emission point concentration). In EPA's June 24, 1999

agreement with CAPCOA and ARB, “Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP”, EPA has agreed that natural-gas-fired combustion sources do not need additional monitoring to verify compliance with Regulation 9, Rule 1, since violations of the regulation are unlikely. Therefore, no monitoring is necessary for this requirement.

PM Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S43, Continuous Annealing Line – Annealing Furnace; S65, #1 Continuous Galvanizing Line – Zinc Coating Pot; S72, #2 Continuous Galvanizing Line – Zinc Coating Pot; S80, #1 Electro-Tinning Line – Pickling Section; S91, #3 Electro-Tinning Line – Pickling Section; S174, KM Continuous Annealing Furnace; S400, Contaminated Soils (SWMUs) – “Out”	BAAQMD Regulation 6-301	Ringelmann 1.0	None
S80, #1 Electro-Tinning Line – Pickling Section; S91, #3 Electro-Tinning Line – Pickling Section; S293, Emergency Standby Diesel Generator- TWTP; S294, Emergency Standby Diesel Generator- KMCAL; S295, Emergency Standby Diesel Generator- Filter Plant; S296, Standby Diesel Generator- #2 CC Line; S297, Emergency Standby Diesel Generator- Computer Bldg; S299, Diesel Fire Pump Packaged System	BAAQMD Regulation 6-310	0.15 gr/dscf	None
S43, Continuous Annealing Line – Annealing Furnace; S174, KM Continuous Annealing Furnace;	BAAQMD Regulation 6-310.3	0.15 gr/dscf at 6% O2	None
S65, #1 Continuous Galvanizing Line – Zinc Coating Pot; S72, #2 Continuous Galvanizing Line – Zinc Coating Pot; S80, #1 Electro-Tinning Line – Pickling Section; S91, #3 Electro-Tinning Line – Pickling Section	BAAQMD Regulation 6-311	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None

**PM Discussion:**

## BAAQMD Regulation 6 “Particulate Matter and Visible Emissions”

### Visible Emissions

BAAQMD Regulation 6-301 limits visible emissions to no darker than 1.0 on the Ringelmann Chart (except for periods or aggregate periods less than 3 minutes in any hour). Visible emissions are normally not associated with combustion of gaseous fuels, such as natural gas. Sources S43 and S174 burn natural gas exclusively, therefore, per the EPA's June 24, 1999 agreement with CAPCOA and ARB titled “Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP”, no monitoring is required to assure compliance with this limit for these sources. There is no gaseous fuel derived visible emissions expected from S65, S72, S80, and S91, periodic monitoring for visible emissions is not necessary.

### Particulate Weight Limitation

BAAQMD Regulation 6-310 limits filterable particulate (FP) emissions from any source to 0.15 grains per dry standard cubic foot (gr/dscf) of exhaust volume. Section 310.3 limits filterable particulate emissions from “heat transfer operations” to 0.15 gr/dscf @ 6% O<sub>2</sub>. These are the “grain loading” standards.

Exceedances of the grain loading standards are normally not associated with combustion of gaseous fuels, such as natural gas. Sources S43 and S174 burn natural gas exclusively, therefore, per the EPA's July 2001 agreement with CAPCOA and ARB entitled "CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources: Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", no monitoring is required to assure compliance with this limit for these sources.

Particulate emissions of S80 are emitted to atmosphere through P26; S91 through P32. Particulate weights of S80 and S91 are calculated based on their associated emission factors, process rates, and gas flow rates:

For S80,  
 $(0.003 \text{ lbs/ton}) * (7000 \text{ grs/lb}) * (50 \text{ tons/hr}) / (60 \text{ mins/hr}) / (6000 \text{ cf/min}) = 0.003 \text{ gr/dscf}$

For S91,  
 $(0.017 \text{ lbs/ton}) * (7000 \text{ grs/lb}) * (50 \text{ tons/hr}) / (60 \text{ mins/hr}) / (6000 \text{ cf/min}) = 0.017 \text{ gr/dscf}$

The calculations show that S80 and S91 are expected to meet the 0.15 gr/dscf standard. Periodic monitoring is not necessary.

The only sources that could potentially exceed these limits are the standby diesel generators S293 through S297 and fire pump S299, which are only operated in the event of an emergency.

The diesel engines S293 through S297 and fire pump 299 operate infrequently and we do not expect any periodic monitoring to be required. AP-42 gives a factor of 0.31 lb/MM Btu for diesel engines. The flue gas factor for diesel combustion is 9190 dscf/MM Btu at 0% oxygen. At typical oxygen levels of 15% in the flue gas, the factor becomes 32,358 dscf/MM Btu. Converting the AP-42 factor into a grain loading and then an exhaust concentration gives the following  $[(0.31 \text{ lb/MM Btu})(7000 \text{ grain/lb})]/32,358 \text{ dscf flue gas} = 0.067 \text{ gr/dscf}$ . The calculated compliance margin is greater than 2.2. Periodic monitoring is not necessary for these sources since their operation is intermittent and since it is expected the engines will easily meet the 0.15 gr/scf standard of 6-310.

Allowable Rate of Emissions Based on Process Weight Rate

The potential to emit of S65, S72, S80, and S91 is calculated based on their emission factors and capacities:

$$S65 \text{ PTE} = 0.003 \text{ lb/ton} * (30 \text{ tons/hr}) = 0.09 \text{ lbs/hr} < 4.10P^{0.67} \text{ lb/hr} = 40 \text{ lbs/hr}$$

$$S72 \text{ PTE} = 0.001 \text{ lb/ton} * (90 \text{ tons/hr}) = 0.09 \text{ lbs/hr} < 4.10P^{0.67} \text{ lb/hr} = 40 \text{ lbs/hr}$$

$$S80 \text{ PTE} = 0.003 \text{ lb ton} * (50 \text{ tons/hr}) = 0.15 \text{ lbs/hr} < 4.10P^{0.67} \text{ lb/hr} = 40 \text{ lbs/hr}$$

$$S91 \text{ PTE} = 0.017 \text{ lb/ton} * (50 \text{ tons/hr}) = 0.85 \text{ lbs/hr} < 4.10P^{0.67} \text{ lb/hr} = 40 \text{ lbs/hr}$$

As a result, no source testing is required because none of these operations is estimated to exceed any standard of Regulation 6.

Changes to permit:

**Table VII - E**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S82 - #1 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S93 - #3 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S155 - NO. 1 ELECTRO-TINNING (TIN FREE STEEL CELL)**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
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**Table VII - E**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S82 - #1 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S93 - #3 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S155 - No. 1 ELECTRO-TINNING (TIN FREE STEEL CELL)**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	<del>BAAQMD 6-1-301</del> <del>BAAQMD 6-301</del>	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD 11-8-93102(e)(2) plus (h)(4)	P/Weekly	Pressure drop monitoring
FP	<del>BAAQMD 6-1-310</del> <del>BAAQMD 6-310</del>	Y		0.15 gr/dscf	BAAQMD 11-8-93102(e)(2) plus (h)(4)	P/Weekly	Pressure drop monitoring
	<del>BAAQMD 6-1-311</del> <del>BAAQMD 6-311</del>	Y		4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	BAAQMD 11-8-93102(e)(2) plus (h)(4)	P/Weekly	Pressure drop monitoring
Hexavalent Chromium	BAAQMD 11-8-93102(e)(2)	Y		0.01 mg/dscm of air	BAAQMD 11-8-93102(e)(1) plus (h)(4)	P/Monthly	Ampere-hour meter
	BAAQMD 11-8-93102(c)(2)	Y		0.01 mg/dscm of air	BAAQMD 11-8-93102(e)(2) plus (h)(4)	P/Weekly	Pressure drop monitoring
	BAAQMD 11-8-93102(c)(2)	Y		0.01 mg/dscm of air	BAAQMD Condition #7579, part <del>36</del>	P/Every two years	Source test
	BAAQMD Condition #7579, part <del>13</del>	Y		<del>0.0060</del> 0.0015 mg/amp-hr	BAAQMD Condition #7579, part <del>36</del>	P/Every two years	Source test
	BAAQMD Condition #7579, part <del>13</del>	Y		<del>0.0060</del> 0.0015 mg/amp-hr	BAAQMD 11-8-93102(e)(2)	C	Pressure drop monitoring

**Table VII - E**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S82 - #1 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S93 - #3 ELECTRO-TINNING LINE – CHEMICAL TREATMENT SECTION**  
**S155 - No. 1 ELECTRO-TINNING (TIN FREE STEEL CELL)**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Annual Amp-hr limit	BAAQMD Condition #7579, part 1c	Y		114.5 million amp-hr/12 months	BAAQMD 11-8-93102(h)(4) (A) and BAAQMD Condition #7579, part 6+	<del>P</del> MonthlyC	Ampere-hour meter

Condition 7579 was modified through AN 19114 in response to revision to ATCM for Chromium Plating and Chromic Acid Anodizing effective on 10/24/07. New emission limits 0.0015 mg/amp-hr of hexavalent chromium became effective 10/24/09. See Appendix I for AN 19114 for more explanation.

**Table VII - H**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S149 – PAINT SHOP SPRAY BOOTH**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Organic compounds	BAAQMD 8-19-302	Y		275 grams/liter for baked coatings and 340 grams/liter for air-dried coatings	BAAQMD 8-19-501	P/W	Record keeping
	BAAQMD 8-19-312	Y		360 to 420 grams/liter for baked coatings and 420 grams/liter for air-dried coatings	BAAQMD 8-19-501	P/W	Record keeping
	BAAQMD 8-19-321	N		50 grams/liter for surface preparation solvent	BAAQMD 8-19-501	P/M	Record keeping
	<u>BAAQMD 8-32-302</u>	<u>N</u>		<u>275 to 700 grams/liter for coatings</u>	<u>BAAQMD 8-32-501</u>	<u>P/M</u>	<u>Record keeping</u>

**Table VII - H**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S149 – PAINT SHOP SPRAY BOOTH**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	<a href="#">BAAQMD 8-32-303</a>	N		<a href="#">480 to 700 grams/liter for coatings</a>	<a href="#">BAAQMD 8-32-501</a>	<a href="#">P/M</a>	<a href="#">Record keeping</a>
	<a href="#">BAAQMD 8-32-304</a>	N		<a href="#">480 to 700 grams/liter for coatings</a>	<a href="#">BAAQMD 8-32-501</a>	<a href="#">P/M</a>	<a href="#">Record keeping</a>
	<a href="#">BAAQMD 8-45-301</a>	N		<a href="#">250 to 780 grams/liter for coatings</a>	<a href="#">BAAQMD 8-45-501</a>	<a href="#">P/D for speciality coatings and P/W for other coatings</a>	<a href="#">Record keeping</a>
	<a href="#">BAAQMD 8-45-308</a>	N		<a href="#">72 grams/liter for surface preparation solvent except 780 grams per liter if plastic parts</a>	<a href="#">BAAQMD 8-45-501</a>	<a href="#">P/M</a>	<a href="#">Record keeping</a>

Coating and solvent limits for two additional rules were added at USS-POSCO's request to the above table since items subject to those rules could also be coated in the booth.

**Table VII - I**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S158 – GASOLINE DISPENSING ISLAND**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Gasoline Through-put	<a href="#">BAAQMD Condition # 129972427 8</a>	N		<del>1.01 million</del> <a href="#">26,107</a> gallons per 12-month period	<a href="#">BAAQMD 8-7-503.1</a>	<a href="#">P/A</a>	<a href="#">Records</a>

**Table VII - I**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S158 – GASOLINE DISPENSING ISLAND**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Through-put (exempt from Phase I)	BAAQMD 8-7-114	Y		1000 gallons per facility for tank integrity leak checking	BAAQMD 8-7-501 and 8-7-503.2	P/E	Records
Organic Compounds	BAAQMD 8-7-301.6	Y		All Phase I Equipment (except components with allowable leak rates) shall be leak free ( $\leq 3$ drops/minute) and vapor tight	BAAQMD 8-7-301.13 and 8-7-503.2	P/A	Static Pressure Performance Test, ST-30
Organic Compounds	<del>BAAQMD 8-7-302.5</del>	<del>Y</del>		<del>All Phase II Equipment (except components with allowable leak rates or at the nozzle/fill pipe interface) shall be leak free (<math>\leq 3</math> drops/minute) and vapor tight</del>	<del>BAAQMD 8-7-302.14 and 8-7-503.2</del>	<del>P/A</del>	<del>Dynamic Back Pressure Performance Test, ST-27</del>
<u>Organic Compounds</u>	<u>BAAQMD Condition #20666 Part 2</u>	<u>Y</u>		<u>Drop tube/drain valve leak rate not to exceed 0.17 CFH @ 2" H<sub>2</sub>O; minimum 360 degree rotation with maximum 108 pound-inch torque</u>	<u>BAAQMD 8-7-503.2 and BAAQMD Condition #20666 Part 2</u>	<u>P/3A</u>	<u>Drop tube/drain valve leak test (CARB TP 201.1 C or 201.1D) and torque test (CARB TP 201.1B)</u>

See the engineering evaluation for Application 10174 and 19679 for an explanation of the above changes except that USS-POSCO voluntarily requested that the throughput for this source be lowered to 26,107 gallons per 12-month period.



**Table VII - Q**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S178 - IRON OXIDE SILO #1**  
**S179 - IRON OXIDE BAGGING STATION**  
**S182 - IRON OXIDE SILO #2**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Hours of Operation	BAAQMD Condition #7216, part G. 9	Y		8640 hours per calendar year	BAAQMD Condition #7216, part N	P/M	Record keeping
Opacity	BAAQMD 6- <del>1</del> -301	<del>Y</del> N		Ringelmann 1.0 for < 3 minutes/hr	<del>BAAQMD CAM Condition #25311, part 5</del> BAAQMD Condition #20781, part 3	<del>P/DP/M</del>	Pressure Drop/Liquid Flow Rate Inspection
		<del>Y</del> N		Ringelmann 1.0 for < 3 minutes/hr	<del>BAAQMD CAM Condition #25311, part 1</del> BAAQMD Condition #20781, part 3	<del>P/WP/M</del>	Visual Observation
		<del>Y</del> N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #7216, part L. 1	P/5 years	Source test
	<u>SIP 6-301</u>	<u>Y</u>		<u>Ringelmann 1.0 for &lt; 3 minutes/hr</u>	<u>BAAQMD CAM Condition #25311, part 5</u>	<u>P/D</u>	<u>Pressure Drop/Liquid Flow Rate Inspection</u>
		<u>Y</u>		<u>Ringelmann 1.0 for &lt; 3 minutes/hr</u>	<u>BAAQMD CAM Condition #25311, part 1</u>	<u>P/W</u>	<u>Visual Observation</u>

**Table VII - Q**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S178 - IRON OXIDE SILO #1**  
**S179 - IRON OXIDE BAGGING STATION**  
**S182 - IRON OXIDE SILO #2**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
		<u>Y</u>		<u>Ringelmann 1.0 for &lt; 3 minutes/hr</u>	<u>BAAQMD Condition #7216, part L. 1</u>	<u>P/5 years</u>	<u>Source test</u>
FP	BAAQMD 6- <del>1</del> -310	<del>N</del> Y		0.15 gr/dscf	<u>BAAQMD CAM Condition #25311, part 5</u> <del>BAAQMD Condition #20781, part 2, part 3</del>	<u>P/DP/M</u>	Pressure Drop/ <u>Liquid Flow Rate</u> Inspection
		<del>N</del> Y		0.15 gr/dscf	<u>BAAQMD CAM Condition #25311, part 1</u> <del>BAAQMD Condition #20781, part 3</del>	<u>P/WP/M</u>	Visual Observation
		<del>N</del> Y		0.15 gr/dscf	BAAQMD Condition #7216, part L. 1	P/5 years	Source test
	<u>SIP 6-310</u>	<u>Y</u>		<u>0.15 gr/dscf</u>	<u>BAAQMD CAM Condition #25311, part 5</u>	<u>P/D</u>	<u>Pressure Drop/Liquid Flow Rate</u> Inspection
		<u>Y</u>		<u>0.15 gr/dscf</u>	<u>BAAQMD CAM Condition #25311, part 1</u>	<u>P/W</u>	<u>Visual Observation</u>

**Table VII - Q**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S178 - IRON OXIDE SILO #1**  
**S179 - IRON OXIDE BAGGING STATION**  
**S182 - IRON OXIDE SILO #2**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
		<u>Y</u>		<u>0.15 gr/dscf</u>	<u>BAAQMD Condition #7216, part L. 1</u>	<u>P/5 years</u>	<u>Source test</u>
	BAAQMD 6- <del>1</del> -311	<del>N</del> Y		4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	<u>BAAQMD CAM Condition #25311, part 5</u> <del>BAAQMD Condition #20781, part 2, part 3</del>	<u>P/DP/M</u>	Pressure Drop/ <u>Liquid Flow Rate</u> Inspection
		<del>N</del> Y		4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	<u>BAAQMD CAM Condition #25311, part 1</u> <del>BAAQMD Condition #20781, part 3</del>	<u>P/WP/M</u>	Visual Observation
		<del>N</del> Y		4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	BAAQMD Condition #7216, part L. 1	P/5 years	Source test
	<u>SIP 6-311</u>	<u>Y</u>		<u>4.10P<sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr</u>	<u>BAAQMD CAM Condition #25311, part 5</u>	<u>P/D</u>	<u>Pressure Drop/Liquid Flow Rate</u> Inspection
		<u>Y</u>		<u>4.10P<sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr</u>	<u>BAAQMD CAM Condition #25311, part 1</u>	<u>P/W</u>	<u>Visual Observation</u>

**Table VII - Q**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S178 - IRON OXIDE SILO #1**  
**S179 - IRON OXIDE BAGGING STATION**  
**S182 - IRON OXIDE SILO #2**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
		<u>Y</u>		<u>4.10P<sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr</u>	<u>BAAQMD Condition #7216, part L, 1</u>	<u>P/5 years</u>	<u>Source test</u>
PM10	BAAQMD Condition #7216, part G. 10	Y		0.46 lbs/hr	BAAQMD Condition #7216, part K. 3	P/5 years	Source test
HCl	BAAQMD Condition #7216, part G. 5	Y		2 ppmv	BAAQMD Condition #7216, part L. 1	P/2 1/2 years	Source test
	BAAQMD Condition #7216, part J. 1	Y		9 tpy on a facility-wide basis	BAAQMD Condition #7216, part J. 2 and 3	P/2 1/2 years	Source test

CAM requirements are added for S178, 179, and 182

**Table VII - S**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S190, ~~S191~~, ~~S194 THROUGH S196~~ S195, S202, S206, ~~S208~~, S210, ~~S214~~, S215, S305, S308, S311, AND S317 -, ~~S218~~ - COLD CLEANERS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Organic compounds	BAAQMD Condition # <del>16920208</del> <u>66</u> , part 1	Y		Net solvent usage of <del>certain</del> <u>solvents</u> <u>Methylated Siloxane</u> not to exceed <del>40450</del> gallons per 12 months	BAAQMD Condition # <del>1692020866</del> , part 3	P/M	Record keeping

**Table VII - S**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S190, ~~S191~~, ~~S194 THROUGH S196~~ S195, S202, S206, ~~S208~~, S210, ~~S214~~, S215, ~~S305~~, ~~S308~~,  
~~S311~~, AND ~~S317~~ -, ~~S218~~ - COLD CLEANERS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition # <del>16920208</del> <u>66</u> , part 2	Y		Allowed usage of other solvents provided POC and NPOC emissions each less than <del>3,7921,000</del> pounds per 12 months	BAAQMD Condition # <del>1692020866</del> , part 3	P/M	Record keeping

See the engineering evaluation for Application 11346 and 16047 for an explanation of the above changes

**Table VII - T**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S217 - COLD CLEANER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Organic compounds	BAAQMD Condition #12790, part 1	Y		Net solvent usage of Safety-Kleen solvents not to exceed 55 gallons per 12 months	BAAQMD Condition #12790, part 3	P/M	Record keeping
	BAAQMD Condition #12790, part 2	Y		Allowed usage of other solvents provided POC plus NPOC emissions less than 358 pounds per 12 months	BAAQMD Condition #12790, part 3	P/M	Record keeping

See the engineering evaluation for Application 11346 for an explanation of the above changes

**Table VII - U**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S285 - COLD CLEANER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Organic compounds	BAAQMD Condition #6818, part 1	Y		Net solvent usage of Safety Kleen solvents not to exceed 200 gallons per 12 months	BAAQMD Condition #6818, part 3	P/M	Record keeping
	BAAQMD Condition #6818, part 2	Y		Allowed usage of other solvents provided POC plus NPOC emissions less than 1,340 pounds per 12 months	BAAQMD Condition #6818, part 3	P/M	Record keeping

See the engineering evaluation for Application 11346 for an explanation of the above changes

**Table VII - TV**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S286 - #1 CRU Evaporator - TFS Operation**  
**S287 - #2 CRU Evaporator - ETL Lines**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD 6-1-301	<del>Y</del>		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #2078+12194, part 2, part 3	P/M	<u>Temperature and Pressure Drop Inspection</u>
	BAAQMD 6-1-301	<del>Y</del>		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #2078+12194, part 3	P/M	Visual Observation
	<u>SIP 6-301</u>	<u>Y</u>		<u>Ringelmann 1.0 for &lt; 3 minutes/hr</u>	<u>BAAQMD Condition #12194, part 3</u>	<u>P/M</u>	<u>Temperature and Pressure Drop Inspection</u>

**Table VII - ~~TV~~**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S286 - #1 CRU Evaporator - TFS Operation**  
**S287 - #2 CRU Evaporator - ETL Lines**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	<a href="#">SIP 6-301</a>	<a href="#">Y</a>		<a href="#">Ringelmann 1.0 for &lt; 3 minutes/hr</a>	<a href="#">BAAQMD Condition #12194, part 3</a>	<a href="#">P/M</a>	<a href="#">Visual Observation</a>
FP	BAAQMD 6- <del>1</del> -310	<del>N</del> Y		0.15 gr/dscf	BAAQMD Condition <del>#20784</del> <a href="#">12194</a> , <del>part 2</del> , part 3	P/M	<a href="#">Temperature and Pressure Drop Inspection</a>
	BAAQMD 6- <del>1</del> -310	<del>N</del> Y		0.15 gr/dscf	BAAQMD Condition <del>#20784</del> <a href="#">12194</a> , part 3	P/M	Visual Observation
	<a href="#">SIP 6-310</a>	<a href="#">Y</a>		<a href="#">0.15 gr/dscf</a>	<a href="#">BAAQMD Condition #12194, part 3</a>	<a href="#">P/M</a>	<a href="#">Temperature and Pressure Drop Inspection</a>
	<a href="#">SIP 6-310</a>	<a href="#">Y</a>		<a href="#">0.15 gr/dscf</a>	<a href="#">BAAQMD Condition #12194, part 3</a>	<a href="#">P/M</a>	<a href="#">Visual Observation</a>
	BAAQMD 6- <del>1</del> -311	<del>N</del> Y		4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	BAAQMD Condition <del>#20784</del> <a href="#">12194</a> , <del>part 2</del> , part 3	P/M	<a href="#">Temperature and Pressure Drop Inspection</a>
	BAAQMD 6- <del>1</del> -311	<del>N</del> Y		4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	BAAQMD Condition <del>#20784</del> <a href="#">12194</a> , part 3	P/M	Visual Observation
	<a href="#">SIP 6-311</a>	<a href="#">Y</a>		<a href="#">4.10P<sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr</a>	<a href="#">BAAQMD Condition #12194, part 3</a>	<a href="#">P/M</a>	<a href="#">Temperature and Pressure Drop Inspection</a>

**Table VII - ~~TY~~**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S286 - #1 CRU Evaporator - TFS Operation**  
**S287 - #2 CRU Evaporator - ETL Lines**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	<a href="#">SIP 6-311</a>	<a href="#">Y</a>		<a href="#">4.10P<sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr</a>	<a href="#">BAAQMD Condition #12194, part 3</a>	<a href="#">P/M</a>	<a href="#">Visual Observation</a>
Hexavalent chromium	BAAQMD Condition #12194, part 1	Y		0.87 lbs/yr	BAAQMD Condition #12194, part 3	P/M	Recordkeeping
	BAAQMD Condition #12194, part 1	Y		0.87 lbs/yr	BAAQMD Condition #12194, part 2	P/2 years	Source test

The table number is changed. Added “CRU” to source description for Source 287. Added instrumentation, monitoring and recordkeeping to the existing condition for the temperature and pressure of the liquid to be sprayed into the evaporator and the pressure drop across the demister and removed conditions for a wet scrubber.

**Table VII - ~~UX~~**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S290 - #2 Continuous Galvanize Line-Strip Stenciller**

**Table VII - ~~VY~~**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S292 - KMCAL Horizontal Electrostatic Oiler**



**Table VII - ~~WZ~~**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S293 - Emergency Standby Generator-TWTP, diesel fueled**  
**S294 - Emergency Standby Generator-KMCAL, diesel fueled**  
**S295 - Emergency Generator-Filter Plant, diesel fueled**  
**S296 - Standby Generator - #2 CC Line, diesel fueled**  
**S297 - Emergency Standby Generator-Computer Bldg, diesel fueled**

**Table VII - ~~XAA~~**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S299 - Diesel Fire Pump Packaged System, 2500 gpm, diesel fueled**

**Table VII - ~~YCC~~**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S400 - Contaminated Soils (SWMUs) – “Out”**  
~~**S401 - Contaminated Soils (CAMU) – “In”**~~

Only the headers are shown for the above tables since only the headers are changed. All tables were renumbered since one or more tables were deleted. The header for table for S400 and S401 was revised to delete S401.

**~~Table VII - BB~~**  
**~~Applicable Limits and Compliance Monitoring Requirements~~**  
**~~S300 THROUGH 312 - SOLVENT CLEANERS~~**

<b>Type of Limit</b>	<b>Citation of Limit</b>	<b>FE Y/N</b>	<b>Future Effective Date</b>	<b>Limit</b>	<b>Monitoring Requirement Citation</b>	<b>Monitoring Frequency (P/C/N)</b>	<b>Monitoring Type</b>
Organic compounds	BAAQMD Condition #20866, part 1	Y		Methylated siloxane usage not to exceed 40 gallons per 12 months	BAAQMD Condition #20866, part 3	P/M	Record keeping
	BAAQMD Condition #20866, part 2	Y		Allowed usage of other NPOC solvents provided NPOC emissions less than 4,108 pounds per 12 months for all sources	BAAQMD Condition #20866, part 3	P/M	Record keeping

See the engineering evaluation for Application 11346 for an explanation of the above changes

**Table VII - Z**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S402 - Horizontal Electrostatic Oiler, Peabody HO LBO 609**

<u>Type of Limit</u>	<u>Citation of Limit</u>	<u>FE Y/N</u>	<u>Future Effective Date</u>	<u>Limit</u>	<u>Monitoring Requirement Citation</u>	<u>Monitoring Frequency (P/C/N)</u>	<u>Monitoring Type</u>
Organic compounds	<u>BAAQMD 8-11-303</u>	<u>Y</u>		<u>Not more than 1.7 lb VOC/gal OR</u>	<u>BAAQMD 8-11-501</u>	<u>P/Daily</u>	<u>Recordkeeping</u>
	<u>BAAQMD 8-11-304</u>	<u>Y</u>		<u>Abatement to no more than 1.0 lb VOC/gal and abatement device efficiency of at least 90%</u>	<u>BAAQMD 8-11-501</u>	<u>P/Daily</u>	<u>Recordkeeping</u>
	<u>BAAQMD Condition #25272, part 1</u>	<u>Y</u>		<u>net usage of: 36,500 gpy Steel Shield 6299 coating oil</u>	<u>BAAQMD Condition #25272, part 3</u>	<u>P/M</u>	<u>Recordkeeping</u>
	<u>BAAQMD Condition #25272, part 2</u>	<u>Y for POC</u>		<u>Optional emission allowance of 0.383 tpy each for POC and NPOC</u>	<u>BAAQMD Condition #25272, part 3</u>	<u>P/M</u>	<u>Recordkeeping</u>

See the engineering evaluation for Application 24291 for an explanation of the above changes

**VIII. Test Methods**

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section IV of the permit.

Changes to permit

The changes proposed to Table VIII are shown below:

**Table VIII  
Test Methods**

<b>Applicable Requirement</b>	<b>Description of Requirement</b>	<b>Acceptable Test Methods</b>
BAAQMD 6-1-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD 6-1-303	Ringelmann No. 2 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD 6-1-310	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
BAAQMD 6-1-311	General Operations	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
BAAQMD 8-1-110.3	Exemption, Process Subject to Regulation 8, Rule 2 or 4	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling or EPA Method 25, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer or 25A, Determination of Total Gaseous Organic Concentration Using a Nondispersive Infrared Analyzer
BAAQMD 8-4-112	Exemption, Organic Diluents	Manual of Procedures, Volume III, Method 9, Determination of Compliance of Solvents, Coatings, and Related Products
BAAQMD 8-4-302	Limitation on Solvents and Surface Coatings (3/17/82)	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling
BAAQMD 8-7-301.1	Phase I Requirements	Manual of Procedures, Volume III, Method 13, Determination of the Reid Vapor Pressure of Petroleum Products
BAAQMD 8-7-301.2	Phase I Requirements	Manual of Procedures, Volume IV, ST-36, Gasoline Dispensing Facility Phase I Volumetric Efficiency <u>or</u> <a href="#">CARB Test Procedure TP-201.1</a>
BAAQMD 8-7-301.6	Phase I Requirements	Manual of Procedures, Volume IV, ST-30, Gasoline Vapor Recovery Leak Test Procedure <u>or</u> <a href="#">CARB Test Procedure TP-201.3 (underground tanks)</a>
BAAQMD 8-7-302.1	Phase II Requirements	Manual of Procedures, Volume III, Method 13, Determination of the Reid Vapor Pressure of Petroleum Products
BAAQMD 8-7-302.5	Phase II Requirements	Manual of Procedures, Volume IV, ST-30, Gasoline Vapor Recovery Leak Test Procedure <u>or</u> <a href="#">CARB Test Procedure TP-201.3 (underground tanks)</a>
BAAQMD 8-7-311	Exempt Tank Requirements	Manual of Procedures, Volume III, Method 13, Determination of the Reid Vapor Pressure of Petroleum Products
BAAQMD 8-7-312	Removal of Gasoline	Manual of Procedures, Volume III, Method 13, Determination of the Reid Vapor Pressure of Petroleum Products
BAAQMD 8-7-404	Certification of New Installations	Manual of Procedures, Volume IV, ST-27, Gasoline Dispensing Facility Dynamic Back Pressure

**Table VIII**  
**Test Methods**

<b>Applicable Requirement</b>	<b>Description of Requirement</b>	<b>Acceptable Test Methods</b>
BAAQMD 8-8-112	Exemption, Wastewater Critical OC Concentration. and/or Temperature	Manual of Procedures, Volume III, Method 33, Determination of Dissolved Critical Volatile Organic Compounds in Wastewater Separators
BAAQMD 8-8-303	Gauging and Sampling Devices	EPA Method 21, Determination of Volatile Organic Compound Leaks
BAAQMD 8-8-305.2	Oil-water Separator and/or Air Flotation Unit Slop Oil Vessels	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling or EPA Method 25, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer or 25A, Determination of Total Gaseous Organic Concentration Using a Nondispersive Infrared Analyzer
BAAQMD 8-16-114	Exemption, Emulsion or Solution Cleaners	Manual of Procedures, Volume III, Method 31, Determination of Precursor Organic Compounds in Paint Strippers for Aerospace Assembly and Component Coating Operations
BAAQMD 8-16-205	Compounds with Low Volatility	ASTM D-1078-78, Standard Test Method for Distillation Range of Volatile Organic Liquids
BAAQMD 8-16-303.1.4	Waste Solvent Residues	Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings or Manual of Procedures, Volume III, Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings
BAAQMD 8-19-210	Pretreatment Wash Primer	ASTM Method D-1613-85, Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer, and Related Products
BAAQMD 8-19-302	Limits	Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings or Manual of Procedures, Volume III, Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings Manual of Procedures, Volume III, Method 31, Determination of <del>Precursor-Volatile</del> Organic Compounds in Paint Strippers, <del>for Aerospace Assembly and Component Coating Operations</del> <u>Solvent Cleaners and Low Solids Coatings</u>

**Table VIII  
 Test Methods**

<b>Applicable Requirement</b>	<b>Description of Requirement</b>	<b>Acceptable Test Methods</b>
BAAQMD 8-19-312	Specialty Coating Limitations	Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings or Manual of Procedures, Volume III, Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings
BAAQMD 8-19-313	Spray Application Equipment Limitations	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling, or EPA Method 25, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer or 25A, Determination of Total Gaseous Organic Concentration Using a Nondispersive Infrared Analyzer
<a href="#"><u>BAAQMD 8-19-321</u></a>	<a href="#"><u>Surface Preparation Standards</u></a>	<a href="#"><u>Manual of Procedures, Volume III, Method 31, Determination of Volatile Organic Compounds in Paint Strippers, Solvent Cleaners and Low Solids coatings</u></a>
<a href="#"><u>BAAQMD 8-32-302 through 8-32-304</u></a>	<a href="#"><u>VOC Content Limits</u></a>	<a href="#"><u>Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings or</u></a> <a href="#"><u>Manual of Procedures, Volume III, Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings</u></a> <a href="#"><u>Manual of Procedures, Volume III, Method 31, Determination of Volatile Organic Compounds in Paint Strippers, Solvent Cleaners and Low Solids coatings</u></a> <a href="#"><u>Manual of Procedures, Volume III, Method 41, Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride</u></a>
<a href="#"><u>BAAQMD 8-45-301</u></a>	<a href="#"><u>VOC Content Limits</u></a>	<a href="#"><u>Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings or</u></a> <a href="#"><u>Manual of Procedures, Volume III, Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings</u></a> <a href="#"><u>Manual of Procedures, Volume III, Method 41, Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride</u></a> <a href="#"><u>Manual of Procedures, Volume III, Method 43, Determination of Volatile Methylsiloxanes in Solvent Based Coatings, Inks and Related Materials</u></a>

**Table VIII  
 Test Methods**

<b>Applicable Requirement</b>	<b>Description of Requirement</b>	<b>Acceptable Test Methods</b>
<a href="#"><u>BAAQMD 8-45-308.4</u></a>	<a href="#"><u>Surface Preparation Standards</u></a>	<a href="#"><u>Manual of Procedures, Volume III, Method 31, Determination of Volatile Organic Compounds in Paint Strippers, Solvent Cleaners and Low Solids coatings</u></a>
BAAQMD 9-1-302	General Emission Limitation	Manual of Procedures, Volume IV, ST-19A, Sulfur Dioxide, Continuous Sampling, or ST-19B, Total Sulfur Oxides Integrated Sample
BAAQMD 9-1-304	Fuel Burning (Liquid and Solid Fuels)	Manual of Procedures, Volume III, Method 10, Determination of Sulfur in Fuel Oils.
BAAQMD 11-8-403	Demonstration of Compliance, Hexavalent Chrome Plating Standard	Manual of Procedures, Volume IV, ST-35, Total and Hexavalent Chromium
BAAQMD 11-8-404	Initial Demonstration of Compliance, Hexavalent Chrome Plating Standard	Manual of Procedures, Volume IV, ST-35, Total and Hexavalent Chromium
BAAQMD Condition #7216, Part L. 1	HCl Emission Concentration Determination	EPA Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources – Isokinetic Method
<a href="#"><u>BAAQMD Condition #20666, Part 2</u></a>	<a href="#"><u>Limited Leakage</u></a>	<a href="#"><u>CARB Test Procedure TP-201.1B and TP-201.1C or TP-201.1D</u></a>

**IX. Permit Shield:**

Changes to permit:

This action proposes no changes to permit shields.

**X. Revision History**

Changes to permit:

- Application 10174, Title V Minor Revision was added
- Application 11346, Title V Minor Revision was added
- Application 16047, Title V Minor Revision was added
- Application 18406, Title V Minor Revision was added
- Application 18407, Title V Minor Revision was added
- Application 18718, Title V Minor Revision was added
- Application 19114, Title V Minor Revision was added
- Application 19679, Title V Minor Revision was added
- Application 24291, Title V Minor Revision was added

**XI. Glossary**

Changes to permit:

The glossary was updated.

**XII. Appendix A - State Implementation Plan**

This section has been deleted. The address for EPA's website is now found in Sections III and IV.

**D. Alternate Operating Scenarios:**

No alternate operating scenario has been requested for this facility.

**E. Compliance Status:**

See Section C.V above.

## APPENDIX A

### GLOSSARY



**APCO**

Air Pollution Control Officer

**ARB**

Air Resources Board

**BAAQMD**

Bay Area Air Quality Management District

**BACT**

Best Available Control Technology

**Basis**

The underlying authority that allows the District to impose requirements.

**CAA**

The federal Clean Air Act

**CAAQS**

California Ambient Air Quality Standards

**CAM**

Compliance Assurance Monitoring per 40 CFR, Part 64

**CEM**

Continuous Emission Monitor

**CEQA**

California Environmental Quality Act

**CFR**

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

**CO**

Carbon Monoxide

**Cumulative Increase**

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Cumulative increase is used to determine whether threshold-based requirements are triggered.

**District**

The Bay Area Air Quality Management District

**dscf**

Dry Standard Cubic Feet

**EPA**

The federal Environmental Protection Agency.

**Federally Enforceable, FE**

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

**FP**

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

**MOP**

The District's Manual of Procedures.

**NAAQS**

National Ambient Air Quality Standards

**NESHAPS**

National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Parts 61 and 63.

**NH3**

Ammonia

**NOx**

Oxides of nitrogen.

**NSPS**

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR Part 60 and District Regulation 10.

**NSR**

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

**Offset Requirement**

A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NOx, PM10, and SO2.

**POC**

Precursor Organic Compounds

**PM**

Particulate Matter

**PM10**

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

**PSD**

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

**SCR**

Selective Catalytic Reduction

**SIP**

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

**SO2**

Sulfur dioxide

**Title V**

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

**TRMP**

Toxic Risk Management Plan

**VOC**

Volatile Organic Compounds

**Units of Measure:**

bhp = brake-horsepower

btu	=	British Thermal Unit
cfm	=	cubic feet per minute
g	=	grams
gal	=	gallon
gpm	=	gallons per minute
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m <sup>2</sup>	=	square meter
min	=	minute
mm	=	million
MMbtu	=	million btu
MMcf	=	million cubic feet
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

## APPENDIX B

### COMPLIANCE ASSURANCE MONITORING (CAM) ANALYSIS

Attachment 1

CAM Applicability Analysis

Permit Evaluation and Statement of Basis: Facility #A2371, Application No: 18038  
USS-POSCO Industries, 900 Loveridge Road, Pittsburg, CA

Source No (S-)	Source Description	Controlled Pollutant	Federally Enforceable Emission Limit or Standard		Control Device for Compliance 40 CFR 64.2(a)(2)	Pre-Control PTE > Major Source Threshold (MST)? 40 CFR 64.3(a)(3)	Subject to CAM?	Compliance Method in Title V Permit
			Emission Limit	Basis				
40 (exempt)	#1 Continuous Annealing Line - Cleaning Section	PM10	0.15 grain/dscf	SIP 6-310	A-12 No.1 C.A. Line-Cleaning Section Fume Scrubber	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
68 (exempt)	#2 Continuous Galvanizing Line - Cleaning Section	PM10	0.15 grain/dscf	SIP 6-310	A-16 No.1 Cont. Galv. Cleaning Section Fume Scrubber	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
70	#2 Continuous Galvanizing Line - Annealing Furnace, Natural Gas Only	PM10	0.15 grain/dscf	SIP 6-310	A-7 Cold Reduction HCl Storage Tank Fume Scrubber	N	N	
70	#2 Continuous Galvanizing Line - Annealing Furnace, Natural Gas Only	SO2	Ground level concentrations shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive	BAAQMD Regulation 9-1-301	A-7 Cold Reduction HCl Storage Tank Fume Scrubber	N	N	

Source No (S-)	Source Description	Controlled Pollutant	Federally Enforceable Emission Limit or Standard		Control Device for Compliance 40 CFR 64.2(a)(2)	Pre-Control PTE > Major Source Threshold (MST)? 40 CFR 64.3(a)(3)	Subject to CAM?	Compliance Method in Title V Permit
			Emission Limit	Basis				
			minutes AND 0.05 ppm averaged over 24 hours					
82	#1 Electro-Tinning Line - Pickling Section	Chromium	0.01 mg/dscm of air	BAAQMD 11-8-93102(c)(2)	A-41 ETL Enforcer III Scrubber #1	N	N	
			0.0015 mg/amp-hr	BAAQMD Condition #7579, part 1				
93	#3 Electro-Tinning Line - Chemical Treatment Section	Chromium	0.01 mg/dscm of air	BAAQMD 11-8-93102(c)(2)	A-42 ETL Enforcer III Scrubber #2	N	N	
			0.0015 mg/amp-hr	BAAQMD Condition #7579, part 1				
96 (exempt)	Tin Finishing - Tin Anode Casting Furnace	PM10	0.15 grain/dscf	SIP 6-310	A-45 Dust Collector	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
97	Tin Finishing - Tin Anode Casting Pot	PM10	0.15 grain/dscf	SIP 6-310	A-45 Dust Collector	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight,	SIP 6-311				

Source No (S-)	Source Description	Controlled Pollutant	Federally Enforceable Emission Limit or Standard		Control Device for Compliance 40 CFR 64.2(a)(2)	Pre-Control PTE > Major Source Threshold (MST)? 40 CFR 64.3(a)(3)	Subject to CAM?	Compliance Method in Title V Permit
			Emission Limit	Basis				
			ton/hr					
134	Terminal Water Treatment Plant	PM10	0.15 grain/dscf	SIP 6-310	A-21 TWTP-Line Handling Dust Collector	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
135 (exempt)	Terminal Treatment Water Plant	PM10	0.15 grain/dscf	SIP 6-310	A-22 TWTP-HCl Storage Tank Fume Scrubber	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
155	No.1 Electro-tinning	Chromium	0.15 g/dscf	SIP 6-310	A-24 Fume Scrubber, A-41 ETL Enforcer III Scrubber #1	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
166	Acid Pickling Coil Processor	PM10	0.15 g/dscf	SIP 6-310	A-26 Pickling Line Baghouse	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				



Source No (S-)	Source Description	Controlled Pollutant	Federally Enforceable Emission Limit or Standard		Control Device for Compliance 40 CFR 64.2(a)(2)	Pre-Control PTE > Major Source Threshold (MST)? 40 CFR 64.3(a)(3)	Subject to CAM?	Compliance Method in Title V Permit
			Emission Limit	Basis				
			0.67 lb/hr	BAAQMD Condition #7216, part B. 1				
167	Acid Pickling Butt Welder	PM10	0.15 grain/dscf	SIP 6-310	A-26 Pickling Line Baghouse	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
			0.67 lb/hr	BAAQMD Condition #7216, part B. 1				
168	Pickling Line Stretch Leveler	PM10	0.15 grain/dscf	SIP 6-310	A-26 Pickling Line Baghouse	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
			0.67 lb/hr	BAAQMD Condition #7216, part B. 1				
169	Acid Pickling Line	PM10	0.15 g/dscf	SIP 6-310	A-27 Pickling Line Scrubber, A-28 Pickling Line Mist	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40	SIP 6-311				

Source No (S-)	Source Description	Controlled Pollutant	Federally Enforceable Emission Limit or Standard		Control Device for Compliance 40 CFR 64.2(a)(2)	Pre-Control PTE > Major Source Threshold (MST)? 40 CFR 64.3(a)(3)	Subject to CAM?	Compliance Method in Title V Permit
			Emission Limit	Basis				
			lb/hr, where P is process weight, ton/hr		Eliminator			
			0.506 lb/hr	BAAQMD Condition #7216, part C. 3				
170 (exempt)	Pickling Line Rinse Tank	PM10	0.15 grain/dscf	SIP 6-310	A-27 Pickling Line Scrubber, A-28 Pickling Line Mist Eliminator	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
173	HCD Alkaline Cleaner	PM10	0.15 grain/dscf	SIP 6-310	A-30 HCD Scrubber	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
174	KM Continuous Annealing Furnace	NOx	Not to exceed 100 lbs/day from S174 plus S177	BAAQMD Condition #7216, part F. 1	A-32 NOx Catalytic Reduction Unit	N	N	

Source No (S-)	Source Description	Controlled Pollutant	Federally Enforceable Emission Limit or Standard		Control Device for Compliance 40 CFR 64.2(a)(2)	Pre-Control PTE > Major Source Threshold (MST)? 40 CFR 64.3(a)(3)	Subject to CAM?	Compliance Method in Title V Permit
			Emission Limit	Basis				
			Not to exceed, except during cold startup and furnace idling, 10 ppm at 3% oxygen or 90% reduction by weight or 80% reduction by weight if running thin gauge	BAAQMD Condition #7216, part F. 4		N	N	
176	Roll Etch Machine	PM10	0.15 grain/dscf	SIP 6-310	A-33 Roll Etch Dust Collector	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
			0.01 grain/dscf	BAAQMD Condition #7216, part H. 2				
177	Iron Oxide Production Roaster - Natural Gas	PM10	0.15 grain/dscf	SIP 6-310	A-36 Hot Gas Cyclone #1, A-37 Hot Gas Cyclone #2, A-	N	N	

Source No (S-)	Source Description	Controlled Pollutant	Federally Enforceable Emission Limit or Standard		Control Device for Compliance 40 CFR 64.2(a)(2)	Pre-Control PTE > Major Source Threshold (MST)? 40 CFR 64.3(a)(3)	Subject to CAM?	Compliance Method in Title V Permit
			Emission Limit	Basis				
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311	39 Venturi Recuperator, A-34 Venturi Scrubber, A-40 Iron Oxide/HCL Plant Demister			
			0.46 lbs/hr	BAAQMD Condition #7216, part G. 10				
177	Iron Oxide Production Roaster - Natural Gas	PM10	0.15 grain/dscf	SIP 6-310	A-36 Hot Gas Cyclone #1, A-37 Hot Gas Cyclone #2, A-39 Venturi Recuperator, A-34 Venturi Scrubber, A-40 Iron Oxide/HCL Plant Demister	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
			0.46 lbs/hr	BAAQMD Condition #7216, part G. 10				
178	Iron Oxide, Silo #1	PM10	0.15 grain/dscf	SIP 6-310	A-34 Venturi Scrubber, A-35 Silo #2 Baghouse, A-38 Silo #1	Y	Y	Pressure Drop and Liquid Flow Rate-P/W-Condition #25311,
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40	SIP 6-311				

Source No (S-)	Source Description	Controlled Pollutant	Federally Enforceable Emission Limit or Standard		Control Device for Compliance 40 CFR 64.2(a)(2)	Pre-Control PTE > Major Source Threshold (MST)? 40 CFR 64.3(a)(3)	Subject to CAM?	Compliance Method in Title V Permit
			Emission Limit	Basis				
			lb/hr, where P is process weight, ton/hr		Baghouse, A-40 Iron Oxide/HCL Plant Demister			Source Test-P/every 5 yrs-Condition #7216
			0.46 lbs/hr	BAAQMD Condition #7216, part G. 10				
179	Iron Oxide Bagging Station	PM10	0.15 grain/dscf	SIP 6-310	A-34 Venturi Scrubber, A-35 Silo #2 Baghouse, A-38 Silo #1 Baghouse, A-40 Iron Oxide/HCL Plant Demister	Y	Y	Pressure Drop and Liquid Flow Rate-P/W-Condition #25311, Source Test-P/every 5 yrs-Condition #7216
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
			0.46 lbs/hr	BAAQMD Condition #7216, part G. 10				
180	Acid Gas Absorber #1	PM10	0.15 grain/dscf	SIP 6-310	A-34 Venturi Scrubber, A-40 Iron Oxide/HCL Plant Demister	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
			0.46 lbs/hr	BAAQMD Condition				

Source No (S-)	Source Description	Controlled Pollutant	Federally Enforceable Emission Limit or Standard		Control Device for Compliance 40 CFR 64.2(a)(2)	Pre-Control PTE > Major Source Threshold (MST)? 40 CFR 64.3(a)(3)	Subject to CAM?	Compliance Method in Title V Permit
			Emission Limit	Basis				
				#7216, part G. 10				
181	Acid Gas Absorber #2	PM10	0.15 grain/dscf	SIP 6-310	A-34 Venturi Scrubber, A-40 Iron Oxide/HCL Plant Demister	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
			0.46 lbs/hr	BAAQMD Condition #7216, part G. 10				
182	Iron Oxide, Silo #2	PM10	0.15 grain/dscf	SIP 6-310	A-34 Venturi Scrubber, A-35 Silo #2 Baghouse, A-38 Silo #1 Baghouse and A-40 Iron Oxide/HCL Plant Demister	Y	Y	Pressure Drop and Liquid Flow Rate-P/W-Condition #25311, Source Test-P/every 5 yrs-Condition #7216
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
			0.46 lbs/hr	BAAQMD Condition #7216, part G. 10				
286	#1 CRU	PM10	0.15 grain/dscf	SIP 6-310	A-43 #1 CRU	N	N	

Source No (S-)	Source Description	Controlled Pollutant	Federally Enforceable Emission Limit or Standard		Control Device for Compliance 40 CFR 64.2(a)(2)	Pre-Control PTE > Major Source Threshold (MST)? 40 CFR 64.3(a)(3)	Subject to CAM?	Compliance Method in Title V Permit
			Emission Limit	Basis				
	Evaporator - TFS Operation		4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311	Evaporator Mist Eliminator			
286	#1 CRU Evaporator - TFS Operation	Chromium	0.87 lbs/yr	BAAQMD Condition #12194, part 1	A-43 #1 CRU Evaporator Mist Eliminator	N	N	
287	#2 CRU Evaporator - ETL Lines	PM10	0.15 grain/dscf	SIP 6-310	A-44 #2 CRU Evaporator Mist Eliminator	N	N	
			4.10P <sup>0.67</sup> lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	SIP 6-311				
287	#2 CRU Evaporator - ETL Lines	Chromium	0.87 lbs/yr	BAAQMD Condition #12194, part 1	A-44 #2 CRU Evaporator Mist Eliminator	N	N	
292	KMCAL Horizontal Electrostatic Oiler	Organics	Not more than 1.7 lb VOC/gal	BAAQMD 8-11-303	A-46 Oil Mist Precipitator	N	N	
			Abatement to no more than 1.0 lb VOC/gal and abatement device efficiency of at least 90%	BAAQMD 8-11-304				

Source No (S-)	Source Description	Controlled Pollutant	Federally Enforceable Emission Limit or Standard		Control Device for Compliance 40 CFR 64.2(a)(2)	Pre-Control PTE > Major Source Threshold (MST)? 40 CFR 64.3(a)(3)	Subject to CAM?	Compliance Method in Title V Permit
			Emission Limit	Basis				
			Control to no more than 0.05 lb/gal	BAAQMD Condition #16682, part 3				
292	KMCAL Horizontal Electrostatic Oiler	Organics	Not more than 1.7 lb VOC/gal	BAAQMD 8-11-303	A-46 Oil Mist Precipitator	N	N	
			Abatement to no more than 1.0 lb VOC/gal and abatement device efficiency of at least 90%	BAAQMD 8-11-304				
			Control to no more than 0.05 lb/gal	BAAQMD Condition #16682, part 3				



## Attachment 2

### Potential to Emit (PTE)

Potential to emit of all abated sources, except for S166, 167, 168, 169 and 176, is tabulated in the following table. Separate analysis for S166, 167, 168, 169 and 176 is shown following the table.

Permit Evaluation and Statement of Basis: Facility #A2371, Application No: 18038  
USS-POSCO Industries, 900 Loveridge Road, Pittsburg, CA

A	B	C	D	E		F	G		H	I	J	K
Source No (S-)	Source Description	Abatement Device	Material Processed / Fuel Burned	Maximum Annual Limit		Controlled Pollutant	Emission Factor		Total Controlled Emissions - (tons/yr) [H=I*J]	Abate Factor	Uncontrolled Emissions Based on Applicable Limit (ton/yr) [J=E*G*Conversion factor]	CAM Triggered?
40 (exempt)	#1 Continuous Annealing Line - Cleaning Section	A-12 No.1 C.A. Line-Cleaning Section Fume Scrubber	Steel	50	ton/hr	PM10	2.00E-03	lb/ton	0.04	1.00E-01	0.44	NO
68 (exempt)	#2 Continuous Galvanizing Line - Cleaning Section	A-16 No.1 Cont. Galv. Cleaning Section Fume Scrubber	Steel	53	ton/hr	PM10	1.00E-01	lb/ton	2.32	1.00E-01	23.21	NO
70	#2 Continuous Galvanizing Line - Annealing Furnace, Natural Gas Only	A-7 Cold Reduction HCl Storage Tank Fume Scrubber	Natural gas	40	MM BTU/hr	PM10	3.00E-03	lb/tho u cu	0.05	1.00E-01	0.49	NO
70	#2 Continuous Galvanizing Line - Annealing Furnace, Natural Gas Only	A-7 Cold Reduction HCl Storage Tank Fume Scrubber	Natural gas	40	MM BTU/hr	SO2	5.68E-04	lb/tho u cu	0.01	1.00E-01	0.09	NO
82	#1 Electro-Tinning Line - Pickling Section	A-41 ETL Enforcer III Scrubber #1	Chrome plating current	5000	amp-hours/hr	Chromium	5.51E-08	lb/amp -hour	0.00	5.01E-06	0.00	NO
93	#3 Electro-Tinning Line - Chemical Treatment Section	A-42 ETL Enforcer III Scrubber #2	Chrome plating current	5000	amp-hours/hr	Chromium	5.51E-08	lb/amp -hour	0.00	5.01E-06	0.00	NO
	Tin Finishing - Tin	A-45 Dust	Natural	0.21	MM	PM10	3.00E-03	lb/tho	0.00	1.00E-02	0.00	NO

A	B	C	D	E		F	G		H	I	J	K
Source No (S-)	Source Description	Abatement Device	Material Processed / Fuel Burned	Maximum Annual Limit		Controlled Pollutant	Emission Factor		Total Controlled Emissions - (tons/yr) [H=I*J]	Abate Factor	Uncontrolled Emissions Based on Applicable Limit (ton/yr) [J=E*G*Conversion factor]	CAM Triggered?
	Anode Casting Furnace	Collector	gas		BTU/hr			u cu				
97	Tin Finishing - Tin Anode Casting Pot	A-45 Dust Collector	Secondary metals	1	ton/hr	PM10	2.00E+00	lb/ton	0.09	1.00E-02	8.76	NO
134	Terminal Water Treatment Plant	A-21 TWTP-Line Handling Dust Collector	Lime	1	ton/hr	PM10	6.00E-02	lb/ton	0.01	3.00E-02	0.26	NO
135 (exempt)	Terminal Treatment Water Plant	A-22 TWTP-HCl Storage Tank Fume Scrubber	Hydrochloric acid	1	ton/hr	PM10	1.50E-01	lb/ton	0.07	1.00E-01	0.66	NO
155	No.1 Electro-tinning	A-24 Fume Scrubber, A-41 ETL Enforcer III Scrubber #1	Chrome plating current	3400	amp-hours/hr	Chromium	5.51E-08	lb/amp-hour	0.00	1.60E-01	0.01	NO
170 (exempt)	Pickling Line Rinse Tank	A-27 Pickling Line Scrubber, A-28 Pickling Line Mist Eliminator	Steel	535	ton/hr	PM10	4.00E-02	lb/ton	0.01	1.00E-04	93.73	NO
173	HCD Alkaline Cleaner	A-30 HCD Scrubber	Steel	175	ton/hr	PM10	2.00E-02	lb/ton	2.30	1.50E-01	15.33	NO
174	KM Continuous Annealing Furnace	A-32 NOx Catalytic Reduction Unit	Natural gas	95.7	MM BTU/hr	NOx	1.40E-01	lb/tho u cu	10.92	2.00E-01	54.59	NO

A	B	C	D	E		F	G		H	I	J	K
Source No (S-)	Source Description	Abatement Device	Material Processed / Fuel Burned	Maximum Annual Limit		Controlled Pollutant	Emission Factor		Total Controlled Emissions - (tons/yr) [H=I*J]	Abate Factor	Uncontrolled Emissions Based on Applicable Limit (ton/yr) [J=E*G*Conversion factor]	CAM Triggered?
177	Iron Oxide Production Roaster - Natural Gas	A-36 Hot Gas Cyclone #1, A-37 Hot Gas Cyclone #2, A-39 Venturi Recuperator, A-34 Venturi Scrubber, A-40 Iron Oxide/HCL Plant Demister	Natural gas	27.6	MM BTU/hr	PM10	3.00E-03	lb/tho u cu	0.02	5.00E-02	0.34	NO
177	Iron Oxide Production Roaster - Natural Gas	A-36 Hot Gas Cyclone #1, A-37 Hot Gas Cyclone #2, A-39 Venturi Recuperator, A-34 Venturi Scrubber, A-40 Iron Oxide/HCL Plant Demister	Iron chloride solution	40	gal/min	PM10	1.00E-03	lb/gal	0.53	5.00E-02	10.51	NO

A	B	C	D	E		F	G		H	I	J	K
Source No (S-)	Source Description	Abatement Device	Material Processed / Fuel Burned	Maximum Annual Limit		Controlled Pollutant	Emission Factor		Total Controlled Emissions - (tons/yr) [H=I*J]	Abate Factor	Uncontrolled Emissions Based on Applicable Limit (ton/yr) [J=E*G*Conversion factor]	CAM Triggered?
178	Iron Oxide, Silo #1	A-34 Venturi Scrubber, A-35 Silo #2 Baghouse, A-38 Silo #1 Baghouse, A-40 Iron Oxide/HCL Plant Demister	Iron oxide	2	ton/hr	PM10	4.50E+01	lb/ton	3.94	1.00E-02	394.20	YES
179	Iron Oxide Bagging Station	A-34 Venturi Scrubber, A-35 Silo #2 Baghouse, A-38 Silo #1 Baghouse, A-40 Iron Oxide/HCL Plant Demister	Iron oxide	12	ton/hr	PM10	3.00E+01	lb/ton	15.77	1.00E-02	1576.80	YES
180	Acid Gas Absorber #1	A-34 Venturi Scrubber, A-40 Iron Oxide/HCL Plant Demister	Hydrochloric acid	2.5	ton/hr	PM10	8.30E-02	lb/ton	0.09	1.00E-01	0.91	NO
181	Acid Gas Absorber #2	A-34 Venturi Scrubber, A-40 Iron Oxide/HCL Plant Demister	Hydrochloric acid	0.3	ton/hr	PM10	8.30E-02	lb/ton	0.01	1.00E-01	0.11	NO

A	B	C	D	E		F	G		H	I	J	K
Source No (S-)	Source Description	Abatement Device	Material Processed / Fuel Burned	Maximum Annual Limit		Controlled Pollutant	Emission Factor		Total Controlled Emissions - (tons/yr) [H=I*J]	Abate Factor	Uncontrolled Emissions Based on Applicable Limit (ton/yr) [J=E*G*Conversion factor]	CAM Triggered?
182	Iron Oxide, Silo #2	A-34 Venturi Scrubber, A-35 Silo #2 Baghouse, A-38 Silo #1 Baghouse and A-40 Iron Oxide/HCL Plant Demister	Iron oxide	2	ton/hr	PM10	4.50E+01	lb/ton	3.94	1.00E-02	394.20	YES
286	#1 CRU Evaporator - TFS Operation	A-43 #1 CRU Evaporator Mist Eliminator	Liquid waste	75	gal/hr	PM10	5.14E-11	lb/gal	0.00	1.00E-03	0.00	NO
286	#1 CRU Evaporator - TFS Operation	A-43 #1 CRU Evaporator Mist Eliminator	Liquid waste	75	gal/hr	Chromium	1.00E-09	lb/gal	0.00	1.00E-03	0.00	NO
287	#2 CRU Evaporator - ETL Lines	A-44 #2 CRU Evaporator Mist Eliminator	Liquid waste	75	gal/hr	PM10	2.46E-10	lb/gal	0.00	1.00E-03	0.00	NO
287	#2 CRU Evaporator - ETL Lines	A-44 #2 CRU Evaporator Mist Eliminator	Liquid waste	75	gal/hr	Chromium	1.00E-09	lb/gal	0.00	1.00E-03	0.00	NO
292	KMCAL Horizontal Electrostatic Oiler	A-46 Oil Mist Precipitator	Cycloparafins - Ferrocote EGL (42%)	3500 0	gal/yr	Organics	7.36E+00	lb/gal	0.32	6.00E-03	54.10	NO

A	B	C	D	E		F	G		H	I	J	K
Source No (S-)	Source Description	Abatement Device	Material Processed / Fuel Burned	Maximum Annual Limit		Controlled Pollutant	Emission Factor		Total Controlled Emissions - (tons/yr) [H=I*J]	Abate Factor	Uncontrolled Emissions Based on Applicable Limit (ton/yr) [J=E*G*Conversion factor]	CAM Triggered?
292	KMCAL Horizontal Electrostatic Oiler	A-46 Oil Mist Precipitator	Cycloparafins - Ferrocote HCL (42%)	1200 0	gal/yr	Organics	8.36E+00	lb/gal	21.19	1.01E+00	21.07	NO

S166 - Acid Pickling Coil Processor, S167 - Acid Pickling Butt Welder, and S168 – Pickling line Stretch Leveler  
abated by A26 Pickling Line Baghouse

Federal enforceable limits:

- (1) PM10: 0.15 grain/dscf,
- (2) PM10: 4.10P0.67 lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr,
- (3) PM10: 0.67 lb/hr

Basis

- Current throughput: 1,020,000 tons steel coil
- Process limit (Condition 7216 A.9): 2,200,000 tons
- Maximum unabated PM emissions based on current annual throughput: 12 TPY

Assume that the PM10 is positively and linearly proportional to the amount of steel processed at these sources, then

Permit Evaluation and Statement of Basis:  
Application No: 18038

Facility #A2371, USS-POSCO Industries  
900 Loveridge Road, Pittsburg, CA

$$\begin{aligned} \text{PTE} &= (12 \text{ TPY}) \times (\text{process limit} / \text{current throughput}) \\ &= (12 \text{ TPY}) \times (2,200,000 \text{ tons} / 1,020,000 \text{ tons}) \\ &= 25.8 \text{ TPY} < 100 \text{ TPY} \end{aligned}$$

S166, 167, and 168 do not trigger CAM requirements.

### S169 – Acid Pickling Line

abated by A27 – Pickling Line Scrubber and A28 – Pickling Mist Eliminator

Federal enforceable limits:

- (1) PM10: 0.15 grain/dscf,
- (2) PM10:  $4.10P^{0.67}$  lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr,
- (3) PM10: 0.506 lb/hr

Basis

- PM emission rate at exhaust stack of S169/A27: 0.0020 gr/dscf  
\*Source testing result from UPI
- S169 wet gas flow rate: 8260 cfm
- Operation hour limit: 8640 hrs/yr
- A27 abatement factor: 0.01

$$\begin{aligned} \text{Controlled (A27) PM emissions} &= 0.0020 \frac{\text{gr}}{\text{dscf}} \times \frac{1 \text{ lb}}{7000 \text{ gr}} \times 8240 \text{ cfm} \times \frac{60 \text{ mins}}{\text{hr}} \times \frac{8640 \text{ hrs}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} \\ &= 0.61 \text{ TPY} \end{aligned}$$

$$\begin{aligned} \text{PTE} &= \text{controlled emissions} / \text{abatement factor} \\ &= 0.61 \text{ TPY} / 0.01 \\ &= 61 \text{ TPY} < 100 \text{ TPY} \end{aligned}$$

S169 does not trigger CAM requirements.

### S176 – Roll Etch Machine

abated by A33 – Roll Etch Dust Collector



Federal enforceable limits:

- (1) PM10: 0.15 grain/dscf,
- (2) PM10:  $4.10P^{0.67}$  lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr,
- (3) PM10: 0.01 grain/dscf

Basis

- PM emission rate at exhaust stack of S176: 0.0010 gr/dscf  
\*Source testing result from UPI
- S176 wet gas flow rate: 4,600 cfm
- Operation hour limit: 8640 hrs/yr
- A33 abatement factor: 0.005

$$\begin{aligned} \text{Controlled PM emissions} &= 0.0010 \frac{\text{gr}}{\text{dscf}} \times \frac{1 \text{ lb}}{7000 \text{ gr}} \times 4,600 \text{ cfm} \times \frac{60 \text{ mins}}{\text{hr}} \times \frac{8640 \text{ hrs}}{\text{yr}} \times \frac{1 \text{ ton}}{2000 \text{ lbs}} \\ &= 0.17 \text{TPY} \end{aligned}$$

$$\begin{aligned} \text{PTE} &= \text{controlled emissions} / \text{abatement factor} \\ &= 0.17 \text{ TPY} / 0.005 \\ &= 34 \text{ TPY} < 100 \text{ TPY} \end{aligned}$$

S176 does not trigger CAM requirements.

## APPENDIX C

### ENGINEERING EVALUATION APPLICATION 10174

**Evaluation Report**  
**A/N 10174**  
**G# 6331 (Plant 2371, Source 158)**  
**USS POSCO, 900 Loveridge Rd., Pittsburg**

**Background**

Bayside Insulation, on behalf of USS-POSCO, has applied for an A/C to replace the Phase I vapor recovery on USS-POSCO's existing underground gasoline tank with EVR certified Phase I equipment. No other work is proposed under this application.

USS-POSCO currently operates a 10,000 gallon underground gasoline tank with one EW A4005 gasoline nozzle equipped with two-point Phase I and balance Phase II vapor recovery equipment. This equipment is permitted as Source 158 at Plant 2371 and is subject to condition #12997, which limits annual gasoline throughput to 1.01 million gallons per year.

Proposed Phase I equipment consists of OPW EVR Phase I per CARB Executive Order VR-102D. All other equipment will remain unchanged.

**Emissions**

No change in permitted throughput has been requested.

As the EVR Phase I equipment is certified at 98% efficiency (vs. 95% for conventional Phase I) there should be no increase in emissions per unit throughput.

The net emission increase under this A/N will be zero.

**Statement of Compliance**

As there will be no net emissions increase from this project, this application is exempt from the BACT and offset requirements of Regulation 2, Rule 2.

The proposed OPW EVR Phase I equipment is certified under G-VR-102D, while the existing Phase II equipment is certified under G-70-17AD and 52AM. Use of CARB certified equipment satisfies all requirements of District Regulation 8, Rule 7.

**Permit Conditions**

*Authority to Construct Conditions:*

**(Data Bank Cond ID# to be assigned)**

1. The Phase I equipment shall be installed in accordance with California Air Resources Board (CARB) Executive Order VR-102 (OPW EVR Phase I systems).
2. Only the replacement of the existing Phase I system with EVR-certified equipment is authorized under this Authority to Construct. No other work, including modifications to dispensers or vapor recovery piping, is allowed.

3. Only over fill prevention devices (e.g., flapper valves, ball floats) listed in the applicable CARB Executive Order as compatible with the Phase I system may be installed. Note: Executive Order VR-104-A prohibits the use of drop tube overflow prevention devices (flapper valves) in conjunction with the CNI EVR Phase I system.
4. No more than three pressure vacuum (PV) valves may be installed on any manifolded tank system. The District recommends that vents be manifolded to a single relief valve whenever possible.
5. The following performance tests shall be successfully conducted within (30) days of start-up:
  - I. **Static Pressure Performance Test, in accordance with CARB procedure TP-201.3 or the applicable equivalent District test procedure (ST-30). If the tank size is 500 gallons or less, the test shall be performed on an empty tank.**
  - II. **Phase I Adaptor Static Torque Test on all rotatable Phase I adaptors in accordance with CARB TP-201.3.**
  - III. **One of the following tests. The measured leak rate for each component shall be within the limits set in the applicable CARB Executive Order:**
    - a) **Stations equipped with drop tube overflow prevention devices (“flapper valves”): a Drop Tube Overflow Prevention Device and Spill Container Drain Valve Leak Test in accordance with CARB Test Procedure TP-201.1D and the applicable CARB Executive Order.**
    - b) **All other stations: a Drop Tube/Drain Valve Assembly Leak Test in accordance with CARB Test Procedure TP-201.1C and the applicable CARB Executive Order.**
6. The applicant shall notify Source Test by FAX at (415) 749-4922, 48 hours prior to any testing required for permitting. Test results for the performance tests required pursuant to conditions #7 shall be submitted within twenty (20) days of test date.
7. The current gasoline throughput at this facility shall not exceed 1.01 million gallons of fuel per year.

*Permit to Operate Conditions*

COND# 12997 -----

Pursuant to BAAQMD Toxic Section policy, this facility's annual gasoline throughput shall not exceed 1.01 million gallons in any consecutive 12 month period. (Basis: District Toxic Risk Management Policy)

COND# 20666 -----

1. The OPW EVR Phase I Vapor Recovery System, including all associated plumbing and components, shall be operated and maintained in accordance with the most recent version of California Air Resources Board (CARB) Executive Order VR-102. Section 41954(f) of the California Health and Safety Code prohibits the sale, offering for sale, or installation of any

vapor control system unless the system has been certified by the state board. (District Regulation 8-7-301.2)

2. The owner or operator shall conduct and pass a Rotatable Adaptor Torque Test (CARB Test Procedure TP201.1B) and either a Drop Tube/Drain Valve Assembly Leak Test (TP201.1C) or, if operating drop tube overflow prevention devices ("flapper valves"), a Drop Tube Overflow Prevention Device and Spill Container Drain Valve Leak Test (TP201.1D) at least once in each 36- month period. Measured leak rates of each component shall not exceed the levels specified in VR-102. Results shall be submitted to BAAQMD within 15 days of the test date in a District-approved format. (District Regulation 8-7-301.2)

**Title V Permit Revisions**

This plant has a Title V permit. This project will require a minor revision of the Title V permit. The revisions to the Title V permit are being processed under A/N 10351.

Proposed revisions to the Title V permit are attached.

**Recommendation**

All fees have been paid. Recommend that an A/C be issued for the above project.

By \_\_\_\_\_ date \_\_\_\_\_

Scott Owen  
Supervising AQ Engineer

## APPENDIX D

### ENGINEERING EVALUATION APPLICATION 11346

**Engineering Evaluation  
USS-POSCO Industries Plant 2371  
Application #11346**

**BACKGROUND**

The applicant, USS-POSCO Industries, applied for an additional three cold cleaners to be used in maintenance and repair activities. Altogether, the applicant will have 30 cold cleaners with permits. All the cold cleaners use VMS, which is one of the compliance options allowed for maintenance and repair activities under Regulation 8, Rule 16, Section 303.5. Thirteen of the cold cleaners were permitted under Application 7773 in 2003. Fourteen cold cleaners were permitted previously when a POC was allowed but remained in compliance with permit conditions since permit conditions allowed the use of an NPOC. This application is for an Authority to Construct/Permit to Operate the following new equipment:

**S314, Cold Cleaner, Safety-Kleen, Model 250 Recycling  
Parts Cleaner, S/N 25022794, 30 Gal**  
**S315, Cold Cleaner, Safety-Kleen, Model 250 Recycling  
Parts Cleaner, S/N 25023158,30 Gal**  
**S316, Cold Cleaner, Safety-Kleen, Model 250 Recycling  
Parts Cleaner, S/N 25023713,30 Gal**

Also, as part of the application, the applicant requested that existing permit Condition 20866 issued under Application 7773 be revised to accommodate these new cold cleaners as well as the 14 cold cleaners permitted prior to Application 7773. The applicant is voluntarily abandoning the allowed use of a POC solvent since the intended cleaning operations do not allow the use of a POC solvent without abatement. The applicant has also requested that these cleaning sources all be uniformly described as "cold cleaners" or "solvent cleaners."

**EMISSIONS CALCULATIONS**

For new sources S314 through S316:

The applicant uses QSOL 300 Cleaning Solvent. A Safety-Kleen product, QSOL300 contains 97.5 – 100% decamethylcyclopentasiloxane, a VMS product containing 0.0 lb/gal VOC as defined in Rule 8-16-229. However, QSOL 300 contains 7.9 lb/gal NPOC under Regulation 1-236. The applicant has specified an annual net usage rate of 40 gallons QSOL300 per cleaner.

NPOC (VMS)	= (40 gal/yr)(7.9 lb/gal)	= 316 lb/yr
	/ (365 days/yr)	= 0.866 lb/day
Total NPOC (VMS)	= (316 lb/yr)(3 cleaners)	= 948 lb/yr
	X (1ton/2000 lb)	= <b>0.474 ton/yr</b>

For the 14 sources permitted prior to Application 7773:

The incorporation of these sources into Permit Condition 20866 with an emission limit of 40 gallons of VMS (or 316 pounds of NPOC) per 12 months per cleaner *reduces* the allowed emissions of VMS and other NPOCs. No credit, Banking or contemporaneous, was requested by USS-POSCO. USS-POSCO indicated that the request was to ease recordkeeping. "Source 285 previously had an emission limit of 1,340 pounds of VOC per 12 months (per Condition 6818). Source 217 previously had an emission limit of 358 pounds of VOC per 12 months (per Condition 12790). The remaining 12 sources previously each had an emission limit of 1,000 pounds of POC and 1,000 pounds of NPOC per 12 months (per Condition 12790).

#### **PLANT CUMULATIVE EMISSIONS**

DataBank does not accurately calculate the NPOC emission increases for previous permit applications. Since NPOC emissions do not trigger the need for offsets, no plant cumulative increase is calculated.

#### **FACILITY LOCATION**

According to the SCHOOL program, the closest school district facility is located 6600 feet from this facility.

#### **TOXIC RISK SCREEN**

There are no toxic materials emitted from these sources so a Toxic Risk Screen was not performed. An alternative NPOC solvent usage will be conditionally allowed provided its use does not trigger a Toxic Risk Screen. The use of an alternative NPOC solvent would also require a change to Regulation 8, Rule 16.

#### **COMPLIANCE**

Sources S-314 through S316 will comply with Regulation 8, Rule 16 - Solvent Cleaning Operations. The operating, safety and control requirements of Regulation 8-16-303 for cold cleaners will be met, including 8-16-303.1, General Operating Requirements, 8-16-303.2, Cold Cleaner Operating Requirements, and 8-16-303.3, Cold Cleaner General Equipment Requirements. The solvent complies with Regulation 8-16-303.5 (VOC/Chemical content), so the control device requirements of Regulation 8-16-303.4 do not apply.

A toxics risk screen is not required since no toxic triggers are exceeded.



This project results in emissions less than 10 lb/day/source. Therefore, BACT is not triggered.

The project is considered ministerial under District's CEQA Regulation 2-1-311 and therefore is not subject to CEQA review.

Offsets, PSD, NSPS, and NESHAPs do not apply.

The project is over 1000 feet from the nearest school and therefore not subject to the public notification of Regulation 2-1-412.

#### PERMIT CONDITIONS

The permit conditions initially generated for Permit Application 7773 have been modified to include the new sources S314 through S316 and the 14 cold cleaners permitted prior to that application. Permit Conditions 6818, 12790 and 16920 have been archived. Revised permit Condition 20866 in underline for new text and strikethrough for deleted text is shown below:

USS-POSCO Industries  
Plant 2371, Application 11346  
Application 11346 for three additional sources, S314 through S316, Cold Cleaners, Safety-Kleen, Model 250 Recycling Parts Cleaner, 30 Gal

COND# 20866 -----

For: S190, S191, S195, S196, S202, S210, S214 and S215, Cold Cleaners,  
          Inland Technology, Model IT-32, 32 Gal  
          S194, Cold Cleaner, Inland Technology, Model SXL48, 48 Gal  
          S206 and S208, Cold Cleaners, System One, Model 500, 35 Gal  
          S217, Cold Cleaner, Graymills Liftkleen T2420 47 Gal  
          S218, Cold Cleaner, Inland Technology, Model 30, 30 gal  
          S285, Cold Cleaner, Custom Bearing Parts Cleaner  
          S300 through S311, ~~Solvent~~ Cold Cleaners, System One, Model 570,

35 Gal and  
S312, ~~Solvent~~ Cold Cleaner, ZEP, Model 9066, 45 Gal  
S314 through S316, Cold Cleaners, Safety-Kleen, Model  
250  
Recycling Parts Cleaner, 30 Gal

1. The Owner/Operator of Cold Cleaners S190, S191, S194 through S196, S202, S206 and S208, S210, S214 and S215, S217, S218, S285, S300 through S312 and S314 through S316 shall not exceed the following usage limits for each cleaner during any consecutive twelve-month period:

Methylated Siloxane 40 gallons/year/cleaner  
(Basis: Cumulative Emissions)

2. The Owner/Operator of sources S190, S191, S194 through S196, S202, S206 and S208, S210, S214 and S215, S217, S218, S285, S300 through S312 and S314 through S316 may use solvent other than the material specified in Part 1 above, and/or usages in excess of those specified in Part 1 above, provided that the Owner Operator can demonstrate that all of the following are satisfied:
  - a. S190, S191, S194 through S196, S202, S206 and S208, S210, S214 and S215, S217, S218, S285, S300 through S312 and S314 through S316 Cold Cleaners comply with Regulations 8-16-303.4 and 8-16-303.5;
  - b. The total NPOC combined emissions from S190, S191, S194 through S196, S202, S206 and S208, S210, S214 and S215, S217, S218, S285, S300 through S312 and S314 through S316 do not exceed ~~4108~~ 9,480 pounds in any consecutive twelve-month period; and
  - c. The use of these materials does not increase toxic emissions above any risk screening trigger level.  
(Basis: Cumulative Emissions)
3. To determine compliance with the above conditions, the Owner/Operator shall maintain the following records and provide all of the data necessary to evaluate compliance with the above conditions, including the following information:
  - a. Quantities of solvent used at each source on a monthly basis.
  - b. If a material other than that specified in Part 1 above is used, NPOC and toxic component contents of

each material used; and mass emission calculations to demonstrate compliance with Part 2, on a monthly basis,  
c. Monthly usage and/or emission calculations shall be totaled for each consecutive twelve-month period.  
(Basis: Cumulative Emissions)

**RECOMMENDATIONS**

I recommend waiving the Authority to Construct and issuing a conditional Permit to Operate to USS-POSCO Industries for:

**S314, Cold Cleaner, Safety-Kleen, Model 250 Recycling  
Parts Cleaner, S/N 25022794, 30 Gal**  
**S315, Cold Cleaner, Safety-Kleen, Model 250 Recycling  
Parts Cleaner, S/N 25023158, 30 Gal**  
**S316, Cold Cleaner, Safety-Kleen, Model 250 Recycling  
Parts Cleaner, S/N 25023713, 30 Gal**

I recommend changing the source description for sources S202, S217, S218, and S300 through S312 to "Cold Cleaner" from "Solvent Cleaner," "Solvent Cold Cleaner," and/or "Solvent Cleaning Operation."

I recommend archiving Permit Conditions 6818, 12790 and 16920 and applying the above revised Permit Condition 20866 to sources S190, S191, S194 through S196, S202, S206 and S208, S210, S214 and S215, S217, S218 and S285.

By: \_\_\_\_\_ Date: \_\_\_\_\_  
Donald Van Buren, PE, Air Quality Engineer II

## APPENDIX E

### ENGINEERING EVALUATION APPLICATION 16047

**Engineering Evaluation Report  
 USS-POSCO Industries  
 Plant # 2371; Application #16047**

I. Background:

USS-Posco Industries USS-POSCO produces the following types of flat rolled steel in accordance with ASTM standards:

- Tin Plate
- Cold Rolled
- Galvanized

The company has applied to obtain an A/C and a P/O to the following cold cleaner that will be used in their workshop for parts cleaning. Two similar cold cleaners that use the same amount of solvent will be removed from service.

*S-317 Cold Cleaner, Inland Technology, Model IT48WC, 42 Gallon Capacity*

*The company will be conditioned to use a maximum of 40 gallons per year of methylated siloxane (VMS), a non-precursor organic compound. EPA added methylated siloxanes to the list of non-photo chemically reactive compounds, Federal Register, October 5, 1994. Then by virtue of Regulation 2-2-227, methylated siloxanes became NPOCs.*

*Emission Calculations:*

NPOC Emissions = 40 gal/yr. X 7.9 lb/gal = 316 lb/yr or 0.158 tons/yr or  
 (Methylated Siloxane) 0.87 lb/day (Annl. avg.)

The emissions of non-precursor organic compound (NPOC) are summarized below.

<u>Source #</u>	<u>Pollutant</u>	<u>lb/day(annual avg.)</u>	<u>Ton/year</u>
317	NPOC	0.87	0.158

The facility cumulative increases will be as follows:

<u>Pollutant</u>	<u>Existing</u>	<u>This Application</u>	<u>Contemporaneous</u>	<u>New Total</u>	
<u>(Ton/yr)</u>		<u>(Ton/yr)</u>	<u>(S-317)</u>	<u>shutdown of S-214</u>	
NPOC		0	0.158	-0.158	0.0

Two similar cold cleaners, S-214 and S-312, that each used the same amount and type of solvent, will be removed from service when the PO for S-317 is issued. Neither S-214 nor S-312 were charged any cumulative increase, POC or NPOC, when each were originally permitted. (See data bank A #2548 and #27784 for S-

214 and A #7773 for S-312). The shutdown of S-214 will be used as a contemporaneous offset of the NPOC increase of S-317, 0.158 ton/yr.

The Shutdown of S-312 will remain available to offset any future NPOC cumulative increase of 0.158 ton /yr.

Condition No. 20866 covered the 30 cold cleaners using methylated siloxanes, each limited to 40 gallons/yr for a mass cap of 9,480 lb NPOC/yr (316 lb/yr/cleaner X 30 cleaners). With this application, the revised total mass cap is:

$$9,480 - 2 \times 316 + 316 = 9,164 \text{ lb NPOC/yr for 29 cold cleaners.}$$

III Statement of Compliance:

Toxic Screening Analysis:

The most used solvent is decamethylcyclopentasiloxane. This chemical is not listed as a Toxic Air Contaminant in Regulation 2-5, Table 2-5-1.

Regulation	Description & Compliance
2-2-301	Best Available Control technology requirements not triggered
8-16-303.5.2	Complies with this regulation since the solvent used is VMS
8-16-303	Complies with solvent cold cleaner requirements, except for the 0.75 freeboard ratio requirement. The freeboard ratio requirement is not applicable as per regulation 8-16-303.4 since the cold cleaner solvent is VMS.
8-16-501.3	Record keeping for solvent usage applies. The source will be conditioned to maintain throughput records.
CEQA	This project is considered to be ministerial under Regulation 2-1-311 and therefore is not subject to CEQA review.
PSD, NSPS, NESHAPS	None of these are triggered
Offsets	Regulation 2-2-302 Not triggered since the facility emissions do not exceed offset trigger.
Toxic risk screening	The solvent used is not a toxic air contaminant listed in Table 2-5-1 of Regulation 2-5

#### IV Conditions:

**CONDITIONS**  
**USS-POSCO Industries**  
**Application Number: 16047 ; Plant Number: 2371**  
**Condition #20866**

The conditions apply to the following Sources:

S190, S191, S195, S196, S202, S210 and S215, Cold Cleaners, Inland Technology, Model IT-32, 32 Gal  
S194, Cold Cleaner, Inland Technology, Model SXL48, 48 Gal  
S206 and S208, Cold Cleaners, System One, Model 500, 35 Gal  
S217, Cold Cleaner, Graymills Liftkleen T2420 47 Gal  
S218, Cold Cleaner, Inland Technology, Model 30, 30 gal  
S285, Cold Cleaner, Custom Bearing Parts Cleaner  
S300 through S311, Cold Cleaners, System One, Model 570, 35 Gal  
S314 through S316, Cold Cleaners, Safety-Kleen, Model 250 Recycling Parts Cleaner, 30 Gal  
S317, Cold Cleaner, Inland Technology, Model IT48WC, 42 Gallon Capacity

Conditions :

1. The Owner/Operator of Cold Cleaners S190, S191, S194 through S196, S202, S206 and S208, S210, S215, S217, S218, S285, S300 through S311 and S314 through S317 shall not exceed the following usage limits for each cleaner during any consecutive twelve-month period:  
Methylated Siloxane 40 gallons/year/cleaner  
(Basis: Cumulative Emissions)
2. The Owner/Operator of sources S190, S191, S194 through S196, S202, S206 and S208, S210, S215, S217, S218, S285, S300 through S311 and S314 through S317 may use solvent other than the material specified in Part 1 above, and/or usages in excess of those specified in Part 1 above, provided that the Owner Operator can demonstrate that all of the following are satisfied:
  - a. S190, S191, S194 through S196, S202, S206 and S208, S210, S215, S217, S218, S285, S300 through S311 and S314 through S317 Cold Cleaners comply with Regulations 8-16-303.4 and 8-16-303.5;

- b. The total NPOC combined emissions from S190, S191, S194 through S196, S202, S206 and S208, S210, S215, S217, S218, S285, S300 through S311 and S314 through S317 do not exceed 9,164 pounds in any consecutive twelve-month period;  
and
- c. The use of these materials does not increase any toxic emissions above their respective risk screening trigger levels.

(Basis: Cumulative Emissions)

3. To determine compliance with the above conditions, the Owner/Operator shall maintain the following records and provide all of the data necessary to evaluate compliance with the above conditions, including the following information:

- a. Quantities of solvent used at each source on a monthly basis.
- b. If a material other than that specified in Part 1 above is used, NPOC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Part 2, on a monthly basis,
- c. Monthly usage and/or emission calculations shall be totaled for each consecutive twelve month period.

(Basis: Cumulative Emissions)

V. Recommendation:

***I recommend that the Authority to Construct be waived and Permit to Operate be issued to the following Source S-317 subject to condition #20866:***

*S-317: Cold Cleaner Made by Inland Technology, Model IT-48WC, 42 Gallon Capacity*



## APPENDIX F

### ENGINEERING EVALUATION APPLICATION 18406

**ENGINEERING EVALUATION**  
**USS-POSCO Industries**  
PLANT NO. 2371  
**APPLICATION NO. 18406**

**BACKGROUND**

USS-POSCO Industries (UPI) is applying for a change of condition to permit condition 7216 to accomplish the following:

- 1) Update line-haul rail emission factors
- 2) Update rail fuel usage factors
- 3) Remove daily cargo carrier recordkeeping and emission calculation requirements

Line-Haul Rail Emission Factors

Permit condition 7216, part A.1 contains annual emission limits for cargo carriers. To monitor compliance with these limits, UPI is required to prepare and submit monthly cargo carrier emissions summary reports. The permit condition specifies the emission factors that must be used to prepare the monthly cargo carrier emission reports. Because these line-haul rail emission factors were developed several years ago, they do not reflect the reduction in rail emissions that have occurred due to newer lower-emissions locomotives entering the rail fleets. Line-haul emission factors are from “Table 9 – Fleet Average Emission Factors For All Locomotives” from the EPA document, “Technical Highlights, Emission Factors for Locomotives” (EPA420-F-97-051, December 1997). Emission factors in the permit condition were last updated in 2002. Table I shows the DPA-developed fleet average rail haul emission factors for 1) the year 2002 (currently in the permit condition) and 2) the year 2008.

Table I  
 Line-Haul Rail Emission Factors

Pollutant	Existing BAAQMD Line-Haul Rail Emission Factors (lbs/kgal)	2008 EPA Line-Haul Emission Factors (lbs/kgal)
NOx	535.70	379.96
CO	52.80	60.35
VOC	19.80	21.15
SOx	71.00	14.27
PM10	13.30	13.22

Emission factors for NOx, SOx, and PM10 are lower than the existing factors. The reduction in NOx and PM10 are due to the gradual replacement of older higher-emission locomotives with newer lower-emission locomotives by the railroad companies. The reduction in SOx rail emission s is due to the requirements of an agreement between the California Air Resources Board (CARB) and the railroad companies to phase in the use of ultra-low sulfur diesel fuel (Part C.2(a) Program Elements, Early Introduction of Lower Sulfur Diesel in Locomotives of “ARB/Railroad Statewide Agreement – Particulate Emission Reduction Program at California Rail Yards, June 2005”).

In permit condition 7216, Appendix A, Step 3 for rail, the new 2008 line-haul emission factors will need to be updated. In addition, the unit train emission factors in part A.4c of the permit condition must also be updated. Appendix A of this permit condition contains the calculation to convert the line-haul emission factors to unit train emission factors using data specific to UPI, such as haul distance, rail car weights, number of rail cars, and fuel factor. The calculations have been verified and the updated unit train emission factors are shown in Table II. The Permit Condition section in this evaluation shows the text of the updated permit conditions.

Table II – Unit Train Emission Factors

Pollutant	Unit Train Emission Factors (lbs emissions/ton of steel hauled)	
	Old	Updated
NOx	0.0490	0.0258
CO	0.0048	0.0041

POC	0.0018	0.0014
PM10	0.0012	0.0009
SO2	0.0065	0.0010

Fuel Usage Factors for Rail

Fuel usage factors are also used in the monthly calculations of cargo carrier emissions that are reported and submitted to the BAAQMD. Because the fuel usage factors were developed several years ago, they do not reflect the increase in locomotive efficiency that has occurred over the years due to newer locomotives entering the rail fleets. Table III shows the fuel usage factors for BNSF Railway and Union Pacific Railway that are currently in the permit condition. It also shows the updated fuel usage factors for these railways. The updated factors were calculated from information in the annual operating reports prepared by BNSF Railway and Union Pacific Railway.

Table III  
 Fuel Usage Factors for Rail

	BNSF	Union Pacific
Fuel Consumption 2007	1,392,717,201 gallons	1,177,581,256 gallons
Reported Gross Ton Mile in 2007	1,230,988,478 KGTM	1,155,090,976 KGTM
Calculated Fuel Usage Factor	1.13 gal/KGTM	1.02 gal/KGTM
Existing BAAQMD Rail Fuel Usage Factors	1.45 gal/KGTM	1.37 gal/KGTM

Fuel usage factors will be updated in permit condition 7216, part A.4a and in the condition’s Appendix A, Step 2 for rail. See Permit Condition section in this evaluation for changes.

Removal of Daily Cargo Carrier Emission Calculation Requirements

As discussed in the prior section, UPI is required to prepare and submit monthly cargo carrier emission summary reports to the BAAQMD. Detailed cargo carrier recordkeeping and emission calculation requirements are in Appendix A of permit condition 7216. These detailed cargo carrier recordkeeping and emission calculations procedure include daily and monthly requirements. The cargo carrier daily recordkeeping and emission calculation requirements are originally included in the conditions because several years ago the permit included both a daily and an annual emission limit on cargo carriers. In a February 1999 application for a permit modification (application 16977), the daily cargo carrier emission limits were removed from condition 7261, but the corresponding requirements for cargo carrier daily recordkeeping and emissions calculations were inadvertently left in Appendix A of the permit condition. The daily recordkeeping and emissions calculations will be removed from the permit condition.

UPI’s request for updating line-haul emission factors and fuel usage factors for rail and the removal of daily cargo carrier recordkeeping and emission calculation requirements will not result in an increase in emissions. The owner/operator will be subject to the same annual cargo carrier emissions limits in condition 7216, part A.1.

**EMISSIONS SUMMARY**

**Annual Emissions:**

***Updating of line-haul emission factors and fuel usage factors for rail will not increase emissions. Removal of daily cargo carrier recordkeeping and emissions calculation requirements will not result in an increase in emissions.***

***The cargo carrier emission limits must be adjusted for RACT to remain fully offset (“Proposed Amendments to BAAQMD Regulation 1 (General Provisions) and Regulation 2 (Permits) Rule 1 (General Requirements), Rule 2 (New Source Review), and Rule 4 (Emissions Banking)”, 2-2-245 Fully Offset, pages 28-29). The original ’85-’87 baseline has been adjusted for the decrease in rail line-haul emission factors and for the decrease in rail fuel usage factors. See Appendix B for the Calculations. Changes are in strikeout/underline format. Cargo carrier emissions were last modified in June 2002 in permit application 32.***

***Calculations are based upon the cargo carrier emission spreadsheet from application 32. The original '85-'87 baseline has been adjusted for the decrease in rail line-haul emission factors and for the decrease in the rail fuel usage factors. Additional cargo emissions from Permit Application 19301 (1999) and 32 (2002) were fully offset and did not require adjustment for RACT.***

*Plant Cumulative Increase:*

***Updating of line-haul emission factors and fuel usage factors for rail will not increase emissions. Removal of daily cargo carrier recordkeeping and emissions calculation requirements will not result in an increase in emissions.***

**Toxic Risk Screening:**

There will be no change in emissions and a risk screening analysis is not required.

## **STATEMENT OF COMPLIANCE**

The owner/operator shall comply with the General Provisions of Regulation 1-301. UPI shall not discharge from any source whatsoever such quantities of air contaminants or other material, which cause injury, detriment, nuisance or annoyance to the public.

The cargo carrier emission limits have been adjusted for RACT and therefore remain fully offset ("Proposed Amendments to BQQMD Regulation 1 (General Provisions) and Regulation 2 (Permits) Rule 1 (General Requirements), Rule 2 (New Source Review), and Rule 4 (Emissions Banking)", 2-2-245 Fully Offset, pages 28-29). The original '85-'87 baseline has been adjusted for the decrease in rail line-haul emission factors and for the decrease in the rail fuel usage factors. Additional cargo emissions from Permit Applications 19301 (1999) and 32 (2002) were fully offset and did not require adjustment for RACT.

Cargo carrier emissions were included in the Negative Declaration for Proposed Modifications to the Approved UPI Steel Mill Modernization and Ship Delivery Project that was approved by the APCO (see application 2371, June 13, 2202). The project complies with CEQA per Regulation 2-1-313.

***The project is over 1000 feet from the nearest school and therefore not subject to the public notification requirements of Reg. 2-1-412.***

**Best Available Control Technology:** In accordance with Regulation 2, Rule 2, Section 301, BACT is triggered for any new or modified source with the potential to emit 10 pounds or more per highest day of POC, NPOC, NO<sub>x</sub>, CO, SO<sub>2</sub> or PM<sub>10</sub>. Emissions will not increase as a result of this application and BACT is not triggered.

**Offsets:** There is no emission increase with this application and offsets do not apply.

PSD, NSPS, and NESHAPS do not apply.

### PERMIT CONDITIONS

*Changes to the permit condition are in ~~strikeout~~/underline format. Due to the length of permit condition 7621, only the portions that pertain to cargo carriers will be shown. These portions include part A and the Appendix.*

COND# 7216 -----

- For S65 - ZINC COATING POT
- S166 - PICKLING LINE COIL PROCESSOR
- S167 - PICKLING LINE BUTT WELDER
- S168 - PICKLING LINE STRETCH LEVELER
- S169 - ACID PICKLING LINE
- S171 - TANDEM COLD MILL
- S173 - HCD ALKALINE CLEANER
- S174 - KM CONTINUOUS ANNEALING FURNACE
- S176 - ROLL ETCH MACHINE
- S177 - IRON OXIDE PRODUCTION ROASTER
- S178 - IRON OXIDE SILO #1
- S179 - IRON OXIDE BAGGING STATION
- S180 - ACID GAS ABSORBER #1
- S181 - ACID GAS ABSORBER #2:
- S182 - IRON OXIDE SILO #2:

(Amended 7/95, AN 14797; 11/96, AN 16832; 5/97, AN 16977; 2/99, AN 19031; 5/02, AN 32; 2/03, AN 6628)

Application 18406 (July 2008): Update Line-Haul Rail emission factors, update fuel usage factors, and remove daily cargo carrier recordkeeping and emission calculation requirements.

A. Conditions on the entire modernization project and ship and train activity are:

\*1. UPI's future cargo emissions shall not exceed the maximum annual mass emissions baseline set forth below. As used herein, "cargo emissions" shall be the emissions resulting from: (1) truck, rail or ship deliveries of steel coil to the UPI facility, (2) truck, rail or ship shipments of finished steel product and scrap steel from the UPI facility, and (3) truck or rail movements of steel coil, finished products, or scrap steel within the UPI facility. "Cargo emissions" shall not include emissions resulting from the transportation of steel coil, finished products, or scrap material to, from or within existing public ports which are not contiguous to the UPI facility, including, but not limited to, the Port of Richmond or the Port of Oakland. (amended 5/97, AN 16977; 2/99, AN 19031; /02, AN 32)

	Annual Tons per year
Particulate Matter	<u>3.330</u> <del>3.427</del>
NOx	<u>90.178</u> <del>100.334</del>
SO2	<u>5.919</u> <del>8.433</del>
Organic Compounds	<u>5.917</u> <del>6.069</del>
CO	<u>12.661</u> <del>12.942</del>

(Basis: Cumulative increase, CEQA)

\*2. The determination of cargo emissions specified in part A. 1 above shall be based on monthly reports submitted by UPI to the District detailing cargo emissions and other information in the format attached as Appendix A, or in such other format as the District may require or approve. Such reports shall be submitted to the Director of Compliance and Enforcement within 30 days after the end of the calendar month that the report relates. UPI shall maintain the records used to prepare such monthly reports for a period of five consecutive calendar years following

the calendar year that each such monthly report was prepared, and shall be made available for inspection by the District upon request. (Appendix A revised 5/02, AN 32)  
(Basis: Cumulative increase, CEQA)

\*3. The monthly report shall include a running total of the cargo emissions for the current calendar year. If, at the end of any calendar month, the total cargo emissions accumulated to date in that calendar year exceed the annual mass emissions baseline (set forth in part A. 1 above) prorated to the number of months elapsed to date for that year, UPI shall inform the District in writing within 30 days of the end of that calendar month as to what steps or measures will be taken to ensure that the annual mass emissions baseline is not exceeded. (amended 5/97, AN 16977)  
(Basis: Cumulative increase, CEQA)

\*4a. Calculations of mass cargo emission shall be based on:  
(1) the emission factors set forth for ship, tugs and specific locomotive engine types in Appendix A; (2) District approved locomotive fuel usage factors; and (3) the truck emission factors in part A. 4c. In the event UPI wishes to use a locomotive engine type for deliveries to and shipments from the UPI facility for which no emission factors are listed on Appendix A, UPI shall obtain prior District approval of the emissions factors to be used with respect to such locomotive engine type. In the event new emission factors are determined by the District, the CARB, or the EPA for locomotive engine types used for deliveries to and from the UPI facility, UPI shall obtain prior District approval to use such new emission factors for purposes of calculating annual mass cargo emissions.

Current District-approved line-haul locomotive fuel usage factors are listed below. These factors supersede the factors in Appendix A. Unless a specific factor is listed below, the Appendix A factors are still valid.

Union Pacific	<u>1.02</u> <del>1.37</del> gal/KGTM
BNSF	<u>1.13</u> <del>1.45</del> gal/KGTM

In lieu of using the calculation method in Appendix A for the Unit Train, UPI may use the emissions factors in part A. 4b. (amended 5/97, AN 16977)  
(Basis: Cumulative increase, CEQA)

\*4b. Calculations of mass cargo emissions from the Unit Train shall be based on the emission factors listed below. These factors, in the units of pounds of emission/ton steel shipped, are based on the parameters listed below, and the line haul engine emission factors listed in Appendix A. If UPI uses these factors, then UPI must keep monthly records of the tonnage of steel hauled by the Unit Train. These records shall be summarized in the monthly report. These records shall be retained on site for five years from the date of entry, and shall be made available to the District upon request.

If a change occurs to one or more of the parameters that were used to derive the emission factors (such as haul distance, railcar tare weight, etc.), and that change results in higher emission factors, UPI shall notify the District in writing and shall use the higher emissions factors effective from the date the change occurred. If a change results in lower emission factors, UPI may petition the District, in writing, for permission to use the lower factors. UPI may not use any lower emission factor, unless authorized to do so by the District, in writing.  
(added 5/97, AN 16977; amended 5/02, AN 32)

Unit Train Parameters:

1-way haul distance	39.7 miles
Empty railcar weight	34 tons
Loaded railcar weight	134 tons
Railcars per train	50
UP fuel usage factor	<u>1.02</u> <del>1.37</del> gal/KGTM

Unit Train Emission Factors

(lb emissions/ton of steel hauled):

NOx	<u>0.0258</u> <del>0.0490</del>
CO	<u>0.0041</u> <del>0.0048</del>
POC	<u>0.0014</u> <del>0.0018</del>
PM10	<u>0.0009</u> <del>0.0012</del>

| SO2 0.0010 ~~0.0065~~  
(Basis: Cumulative increase, CEQA)

\*4c. Calculations of mass cargo emissions from hauling raw steel, product or scrap by truck shall be calculated by multiplying vehicle mileage and the "lb/mile" emission factors listed below. [The emission factors are the average ARB 2002 heavy-heavy duty truck (> 33,000 lb) emission factors for the San Francisco air basin.] UPI shall summarize truck mileage and cargo carrier emissions in their monthly report. (added 5/97, AN 16977; amended 5/02, AN 32)

Pollutant	(lb/mile)
NOx	0.0345
CO	0.0059
POC	0.0014
PM10	0.0009
SO2	0.0004

(Basis: Cumulative increase, CEQA)

5. UPI shall not be exempt from the application of any future amendment to the District's Rules and Regulations. (Basis: Regulation 1-103)

\*6. Only steel coil shall be delivered by 37,000 dead weight ton (DWT) or less ships and offloaded at the UPI dock.  
(Basis: Cumulative increase, CEQA)

\*7. The steel coil shall only be delivered by ocean going bulk cargo ships of 37,000 DWT or less.  
(Basis: Cumulative increase, CEQA)

8a. The total number of SCR plus non-SCR-equipped ship deliveries to UPI shall not exceed 50 in any consecutive 365 day period.

\*8b. The total number of non-SCR-equipped ship deliveries shall not exceed 25 in any consecutive 365-day period.  
(amended AN 32, 5/02)  
(Basis: Cumulative increase, CEQA)

9. In no event shall the limits set forth in part A.8 result in a total combined annual throughput of unfinished steel coil in excess of 2,200,000 tons at UPI. (amended AN 16832, 11/96; AN 32, 5/02)  
(Basis: Cumulative increase, CEQA)

\*10. While a SCR-equipped ship is transiting in District boundary waters the following shall occur:

- a. The main engine exhaust shall be abated by a selective catalytic reduction (SCR) system.
- b. Only fuel oil with a sulfur content not to exceed 0.05% sulfur by weight shall be burned. (amended AN 32, 5/02)  
(Basis: Cumulative increase, CEQA)

\*11. For SCR-equipped ships, the main engine exhaust shall be equipped with a NOx continuous emission monitor (CEM) and recording device. The CEM system shall be used to determine and record the daily NOx emission from the ship main engine during a ship transit in District boundary water. (amended AN 32, 5/02)  
(Basis: Cumulative increase, CEQA)

\*12. For SCR-equipped ships, in no event shall ammonia emissions to the atmosphere exceed 50 ppmv, averaged over a two hour period. (amended AN 32,5/02)  
(Basis: Cumulative increase)

\*13. For SCR-equipped ships, each ship shall use on-shore electrical power when hoteling at the UPI facility. The main propulsion engine, generators and boiler shall shutdown during hoteling at the UPI facility. (amended AN 32, 5/02)

(Basis: Cumulative increase, CEQA)

14. UPI shall maintain daily records, in a District approved log, for the following:

- a. Date and time of a shipping docking at the UPI terminal.
  - \*b. Fuel usage for each ship transit through District boundary water. Fuel usage shall be automatically recorded on a District approved continuous fuel recording system.
  - \*c. Delivery receipts for the type of fuel burned.
  - \*d. Hours of ship operation in District boundary water.
  - \*e. Loading capacity of ship in DWT.
  - f. Tonnage of steel coil delivered to UPI by ship.
  - \*g. Date and time of a ship departure from the UPI terminal.
- (Basis: Cumulative increase, CEQA)

15. All records shall be retained on the ship until docking at UPI at which time they shall retained at UPI for at least five years from date of recording. These records shall be kept on site at UPI and made available to District staff upon request. (Basis: Cumulative increase, CEQA)

\*16. The procedures and methodology to be used in calculating transportation emissions set forth in Appendix A that is attached hereto are incorporated as part of the Permit to Operate.  
(Basis: Cumulative increase, CEQA)

\*APPENDIX A TO PERMIT CONDITION #7216, FOR TRAINS

The procedures and methodology to be used in calculating transportation emissions for the purpose of demonstrating compliance with the USS-Posco permit condition.

The methodology and calculation procedures require gathering the raw data (STEP 1), determining fuel usage rates (STEP 2), applying pollutant specific emission factors (STEP 3).

Calculated monthly emissions shall be reported in tons ~~and calculated daily emissions shall be reported in pounds~~ (STEP 4).

STEP 1.

Collection of Raw Data Regarding Train Activity at USS-POSCO, Pittsburg, CA

INCOMING TRAIN SHIPMENTS. The following information, associated with each locomotive, shall be collected, recorded, and used in subsequent calculations:

- Arrival Date and Time
- Specify as to Type of Delivery (ex. steel coil)
- Carrier and Train Number
- Number of Locomotives Used
- Engine Type
- Number of Cars
- Idle Time in Minutes
- Quantity of Product Shipped (in tons)
- Random Check of Car Weight determined by UPI scale



- Distance Traveled in District
- Invoice Records

OUTGOING TRAIN SHIPMENTS. The following information, associated with each locomotive, shall be collected, recorded, and used in subsequent calculations:

- Departure Date and Time
- Specify as to Type of Delivery (ex. steel coil, scrap, iron oxide)
- Carrier and Train Number
- Number of Locomotives Used
- Engine Type
- Type of Cars
- Number of Cars
- Quantity of Product Shipped (in tons)
- Distance Traveled in District
- Invoice Records

OUTGOING TRAINS CARRYING UPI MATERIAL AS PART OF A SECTION TRAIN WITHIN DISTRICT. The following information, associated with each locomotive, shall be collected, recorded, and used in subsequent calculations:

- Departure Date and Time
- Specify as to Type of Delivery (ex. steel coil, scrap, iron oxide)
- Carrier and Train Number
- Number of Locomotives Used for UPI Cars
- Engine Type
- Type of Cars
- Number of Cars
- Quantity of Product Shipped (in tons)
- Distance Traveled in District
- Invoice Records

SWITCHING ACTIVITY. The following information, associated with each locomotive, shall be collected, recorded, and used in subsequent calculations:

UPI switching locomotives:

- fuel loaded into locomotive
- invoice records

FOR switching at SF/SP switch yard:

- Switching Invoice Records
- Same information required for SP line haul

STEP 2.

DETERMINING FUEL USAGE RATES

The District approved railroad system factors:

- | Union Pacific (laden & unladen): 1.02 ~~1.37~~ gallon/KGTM
- | Southern Pacific (laden & unladen): 1.67 gallon/KGTM
- | Santa Fe (laden & unladen): 1.13 ~~1.78~~ gallon/KGTM

LINE HAUL TRAINS (incoming raw coils, outgoing finished product and scrap):

((number of cars) \* (gross weight of cars) \* (miles traveled within District) / (1000)) \* (Railroad carrier system factor, in gal/KGTM) \* (Emission Factor for Pollutant)

UNLADEN LINE HAUL TRAINS:

The miles traveled by a returning unladen train from UPI to Union Pacific or receiving an incoming unladen train to carry UPI shipments are assumed to be identical to the miles traveled within the District for the laden train. The method of calculation for line haul trains is then followed.

UPI SWITCH ENGINES

(Fuel usage) \* (Emission Factor for Pollutant)

Santa Fe/Southern Pacific Switching:

(5% of the SP fuel usage due to UPI outbound cars)

STEP 3.

EMISSION FACTORS

The District approved emission factors for baseline calculations at the UPI facility are as follows:

Switch	Line-Haul
Engines	Engines
(lb/Kgallons)	(lb/Kgallons)

Nitrogen Oxides (NOx)	718.3	<del>535.7</del>	<u>379.96</u>
Carbon Monoxide (CO)	75.6	<del>52.8</del>	<u>60.35</u>
Hydrocarbons (HC)	41.7	<del>19.8</del>	<u>21.15</u>
Sulfur Oxides (SOx)	71.0	<del>71.0</del>	<u>14.37</u>
PM10	18.3	<del>13.3</del>	<u>13.22</u>

(1) SOx emission factor: (7.1#/gal) (%S by wt) (2) (1000) as SO2  
 (note: sulfur content of 0.5% is being used based on line haul fuel)

STEP 4.

CALCULATED MONTHLY ~~AND DAILY~~ EMISSIONS

To be kept by USS-Posco on a ~~monthly~~ daily record keeping basis. The records which are required to be submitted to the District pursuant to Condition 2 on the entire modernization project may be submitted in the form of the attached summary sheets or in such other format as the Air Pollution Control Officer may approve.

~~DAILY RECORD OF RAIL TRANSPORT~~

**RAW COILS**

Note: Use one Daily Record form for each shipment.

- (1) Date of receipt \_\_\_\_\_
- (2) Name of cargo carrier \_\_\_\_\_  
(If the carrier is other than Union Pacific,  
give name of carrier.)
- (3) Number of cars \_\_\_\_\_
- (4) Tare weight of average car \_\_\_\_\_ tons
- (5) Total tare weight, (3) x (4) \_\_\_\_\_ tons
- (6) Net weight of coils \_\_\_\_\_ tons
- (7) Gross weight of rail cars, (5) + (6) \_\_\_\_\_ tons
- (8) Number of engines used by incoming train \_\_\_\_\_

Note: Rail Car is assumed to be a flatcar with average tare weight of 68,400 pounds. If a different kind of rail car is used, enter the new tare weight.

**DAILY RECORD OF RAIL TRANSPORT  
FINISHED PRODUCTS**

Sheet Steel

Note: Use one Daily Record form for each shipment.

- (1) Date shipped \_\_\_\_\_
- (2) Destination (City, State) \_\_\_\_\_
- (3) Type of rail cars used \_\_\_\_\_
- (4) Average tare weight of car \_\_\_\_\_ tons
- (5) Number of cars \_\_\_\_\_
- (6) Total tare weight, (4) x (5) \_\_\_\_\_ tons
- (7) Net weight of product \_\_\_\_\_ tons
- (8) Gross weight of product, (6) + (7) \_\_\_\_\_ tons

Note: Rail Car is assumed to be a covered gondola with an average tare weight of 75,000 pounds. If a different kind of rail car is used, enter the new tare weight.

**DAILY RECORD OF RAIL TRANSPORT  
FINISHED PRODUCTS**

Tinplate

Note: Use one Daily Record form for each shipment.

- (1) Date shipped \_\_\_\_\_
- (2) Destination (City, State) \_\_\_\_\_
- (3) Type of rail cars used \_\_\_\_\_
- (4) Average tare weight of car \_\_\_\_\_ tons
- (5) Number of cars \_\_\_\_\_
- (6) Total tare weight, (4) x (5) \_\_\_\_\_ tons
- (7) Net weight of product \_\_\_\_\_ tons
- (8) Gross weight of product, (6) + (7) \_\_\_\_\_ tons

Note: Rail car is assumed to be a box car with an average tare weight of 78,300 pounds. If a different kind of car is used, enter the new tare

~~weight.~~

~~DAILY RECORD OF RAIL TRANSPORT  
SCRAP STEEL~~

~~Note: Use one Daily Record form for each shipment.~~

- ~~(1) Date shipped \_\_\_\_\_~~
- ~~(2) Destination (City, State) \_\_\_\_\_~~
- ~~(3) Type of rail cars used \_\_\_\_\_~~
- ~~(4) Average tare weight of car \_\_\_\_\_ tons~~
- ~~(5) Number of cars \_\_\_\_\_~~
- ~~(6) Total tare weight, (4) x (5) \_\_\_\_\_ tons~~
- ~~(7) Net weight of scrap \_\_\_\_\_ tons~~
- ~~(8) Gross weight of scrap, (6) + (7) \_\_\_\_\_ tons~~

~~Note: Rail car is assumed to be a gondola with an average tare weight of 65,900 pounds. If a different kind of car is used, enter the new tare weight.~~

~~DAILY RECORD OF RAIL TRANSPORT  
UPI SWITCH ENGINES~~

~~Fuel Deliveries~~

- ~~(1) Date of delivery \_\_\_\_\_~~
- ~~(2) Engine 1 \_\_\_\_\_ gallons~~
- ~~(3) Engine 2 \_\_\_\_\_ gallons~~
- ~~(4) Engine 3 \_\_\_\_\_ gallons~~
- ~~(5) Engine 4 \_\_\_\_\_ gallons~~
- ~~(6) Fuel delivered for switch engines,  
(2) + (3) + (4) + (5) \_\_\_\_\_ gallons~~

SUMMARY OF MONTHLY RAIL TRANSPORT  
FUEL USAGE -- RAW COILS

Line-haul transport by Union Pacific

- (1) Tare weight of rail cars \_\_\_\_\_ tons
- (2) Gross weight of rail cars \_\_\_\_\_ tons
- (3) Distance traveled in BAAQMD 19.3 miles
- (4) Unit fuel usage (laden) 1.02 ~~1.37~~ gal/KGTM
- (5) Unit fuel usage (unladen) 1.02 ~~1.37~~ gal/KGTM
- (6) Fuel usage (inbound),  
(2) x (3) x (4) + 1000 \_\_\_\_\_ gallons
- (7) Fuel usage (outbound),  
(1) x (3) x (5) + 1000 \_\_\_\_\_ gallons

Positioning - Union Pacific

- (8) Number of shipments \_\_\_\_\_
- (9) Fuel per shipment 10 gallons
- (10) Fuel Usage, (8) x (9) \_\_\_\_\_ gallons

Idling - Union Pacific

- (11) Number of engines \_\_\_\_\_
- (12) Fuel per engine 1.67 gallons
- (13) Total Usage \_\_\_\_\_ gallons
- (14) Total Union Pacific fuel usage,
- (6) + (7) + (10) + (13) \_\_\_\_\_ gallons

SUMMARY OF MONTHLY RAIL TRANSPORT  
FUEL USAGE -- FINISHED PRODUCTS

Transport from UPI to SF/SP Yard by Santa Fe Switch  
Engines

- (1) Tare weight of rail cars \_\_\_\_\_ tons
- (2) Gross weight of rail cars \_\_\_\_\_ tons
- (3) Distance traveled in BAAQMD 2.0 miles
- (4) Unit fuel usage 1.13 ~~1.78~~ gal/KGTM
- (5) Fuel usage (inbound),
- (1) x (3) x (4) + 1000 \_\_\_\_\_ gallons
- (6) Fuel usage (outbound),
- (2) x (3) x (4) + 1000 \_\_\_\_\_ gallons
- (7) Total Santa Fe fuel usage,
- (5) + (6) \_\_\_\_\_ gallons

Transport to destination by Southern Pacific line-haul  
engines

Northern Route (toward Roseville)

- (8) Distance traveled in BAAQMD 37.7 miles
- (9) Unit fuel usage 1.67 gal/KGTM
- (10) Fuel usage (inbound),
- (1) x (8) x (9) + 1000 \_\_\_\_\_ gallons
- (11) Fuel usage (outbound),
- (2) x (8) x (9) + 1000 \_\_\_\_\_ gallons

Southern Route (toward Tracy)

- (12) Distance traveled in BAAQMD 25.7 miles
- (13) Unit fuel usage 1.67 gal/KGTM
- (14) Fuel usage (inbound),
- (1) x (12) x (13) + 1000 \_\_\_\_\_ gallons
- (15) Fuel usage (outbound),
- (2) x (12) x (13) + 1000 \_\_\_\_\_ gallons

Both Routes

- (16) Total SP line-haul fuel usage,
- (10) + (11) + (14) + (15) \_\_\_\_\_ gallons

Transport at SF/SP yard by Southern Pacific switch  
engines

- (17) Switching fuel usage as a fraction  
of line-haul fuel usage 0.0526
- (18) Total SP switching fuel usage,
- (17) x (16) \_\_\_\_\_ gallons

Note: Switching fuel usage is assumed to be 5 percent of the railroad's total fuel usage in the BAAQMD. The remaining 95 percent is for line-hauling. Switching usage is 5.26 percent of line-hauling usage.

SUMMARY OF MONTHLY RAIL TRANSPORT  
FUEL USAGE -- SCRAP STEEL

Transport from UPI to SF/SP Yard by Santa Fe Switch Engines

- (1) Tare weight of rail cars \_\_\_\_\_ tons
- (2) Gross weight of rail cars \_\_\_\_\_ tons
- (3) Distance traveled in BAAQMD 2.0 miles
- (4) Unit fuel usage 1.13 ~~1.78~~ gal/KGTM
- (5) Fuel usage (inbound),  
(1) x (3) x (4) + 1000 \_\_\_\_\_ gallons
- (6) Fuel usage (outbound),  
(2) x (3) x (4) + 1000 \_\_\_\_\_ gallons
- (7) Total Santa Fe fuel usage,  
(5) + (6) \_\_\_\_\_ gallons

Transport to destination by Southern Pacific line-haul engines

Northern Route (toward Roseville)

- (8) Distance traveled in BAAQMD 37.7 miles
- (9) Unit fuel usage 1.67 gal/KGTM
- (10) Fuel Usage (inbound),  
(1) x (8) x (9) + 1000 \_\_\_\_\_ gallons
- (11) Fuel Usage (outbound),  
(2) x (8) x (9) + 1000 \_\_\_\_\_ gallons

Southern Route (toward Tracy)

- (12) Distance traveled in BAAQMD 25.7 miles
- (13) Unit fuel usage 1.67 gal/KGTM
- (14) Fuel usage (inbound),  
(1) x (12) x (13) + 1000 \_\_\_\_\_ gallons
- (15) Fuel usage (outbound),  
(2) x (12) x (13) + 1000 \_\_\_\_\_ gallons

Both Routes

- (16) Total SP line-haul fuel usage,  
(10) + (11) + (14) + (15) \_\_\_\_\_ gallons

Note: If any scrap steel is shipped within the Bay Area Air Quality Management District, the mileage from UPI to the receiving location must be determined and entered on Line (8) or (12).

Transport at SF/SP yard by Southern Pacific switch engines

(17) Switching fuel usage as a fraction  
of line-haul fuel usage 0.0526

(18) Total SP switching fuel usage,  
(17) x (16) \_\_\_\_\_ gallons

Note: Switching fuel usage is assumed to be 5 percent of  
the railroad's total fuel usage in the BAAQMD.  
The remaining 95 percent is for line-hauling.  
Switching usage is 5.26 percent of line-hauling  
usage.

MONTHLY SUMMARY OF RAIL TRANSPORT  
FUEL USAGE -- UPI SWITCH ENGINES

UPI Switch Engines

(1) Fuel delivered for switch engines \_\_\_\_\_ gallons

SUMMARY OF MONTHLY RAIL TRANSPORT  
TOTAL FUEL USAGE  
ALL TRANSPORT METHODS

Line-haul engines

(1) Union Pacific, (Page 1, Line 14) \_\_\_\_\_ gallons  
(2) Southern Pacific, (Page 3, Line 16) +  
(Page 5, Line 16) \_\_\_\_\_ gallons  
(3) Total line-haul engines,  
(1) + (2) \_\_\_\_\_ gallons

Switch engines

(4) Santa Fe, (Page 2, Line 7) +  
(Page 4, Line 7) \_\_\_\_\_ gallons  
(5) Southern Pacific, (Page 3, Line 18)  
+ (Page 5, Line 18) \_\_\_\_\_ gallons  
(6) UPI (Page 6, Line 1) \_\_\_\_\_ gallons  
(7) Total switch engines,  
(4) + (5) + (6) \_\_\_\_\_ gallons

SUMMARY OF MONTHLY RAIL TRANSPORT  
EMISSION CALCULATIONS  
ALL TRANSPORT METHODS

Operation NOx CO HC SOx PM10

Line-haul engines

Fuel use \_\_\_\_\_ gallons (Page 7, Line 3)

Emission factor,

(lb/1000 gal) 379.96 535.7 60.35 52.8 21.15 49.8 14.37 74.0 13.22 43.3

Emissions (tons/mo) \_\_\_\_\_

Switch engines

Fuel use \_\_\_\_\_ gallons (Page 7, Line 7)

Emission factor,

(lb/1000 gal) 718.3 75.6 41.7 71.0 18.3

Emissions (tons/mo) \_\_\_\_\_

Monthly Total

Actual Emissions,  
(tons/mo) \_\_\_\_\_

Prorated Baseline  
Emissions (tons/mo) \_\_\_\_\_

Calculations:

(1) Divide each category's fuel use from previous summary sheets by 1,000 to compute 1000's of gallons of fuel used per month.

(2) Multiply fuel use by emission factor and divide result by 2,000 to compute emissions in tons per month.

\*APPENDIX A TO PERMIT CONDITION #7216, FOR SHIPS

The procedures and methodology to be used in calculating transportation emissions for the purpose of demonstrating compliance with the USS-POSCO permit condition.

The methodology and calculation procedures require gathering the raw data (STEP 1), determining fuel usage rates (STEP 2), applying pollutant specific emission factors (STEP 3).

Calculated monthly emissions shall be reported in tons and calculated daily emissions shall be reported in pounds (STEP 4).

STEP 1.

Collection of Raw Data regarding Ship Activity at USS-POSCO, Pittsburg, CA

INCOMING SHIP SHIPMENTS. The following information, associated with each ship, shall be collected, recorded, and used in subsequent calculations:

- Arrival Date and Time
- Specify as to Type of Delivery (ex. steel coil)
- Ship Name
- DWT
- Quantity of Product Shipped (in tons)
- Distance Traveled in District
- Invoice Records for fuel oil
- CEM Charts for Main Engine for SCR-equipped ships

OUTGOING SHIP SHIPMENTS. The following information, associated with each ship, shall be collected, recorded, and used in subsequent calculations:

- Departure Date and Time
- Specify as to Type of Delivery (empty)
- Ship Name



- DWT
- Quantity of Product Shipped (in tons, if any)
- Distance Traveled in District
- CEM Charts for Main Engine for SCR-equipped ships

STEP 2.  
DETERMINING FUEL USAGE RATES

For the Main Engine use the recorded rate from the ship recorder.

For the Diesel Generator use AP-42 Equation of (0.0959 gal/Kw-Hr) (Generator Load, in Kw-Hr)

Generator Load is determined as follows: 2 generators operate at 25% load during the transit time. During docking of the ship the 3 generators are assumed to operate at 50% power. After docking, 1 generator is assumed to operate at 25% load. Switching to shore power for SCR-equipped ships is assumed to take 0.5 hours.

Boiler fuel usage is 30 gal/hr times the length of the voyage.

STEP 3.  
EMISSION FACTORS

For Main Engines:

NOx: lbs/day from CEM Chart for SCR-equipped ships and 750 lbs NOx/Mgal for non-SCR-equipped ships

CO: (56.9 lbs CO/Mgal)

PM10: (20 lbs PM10/Mgal)

POC: (32.8 lbs POC/Mgal)

SO2: is calculated based on 0.5% S in fuel

Calculation to be: (Fuel Rate, gals)  
(7.2 lbs/gal) (0.005/100) (64/32) = SO2

For Diesel Generator:

NOx: (222 lbs NOx/Mgal)

CO: (53.4 lbs CO/Mgal)

POC: (109 lbs POC/Mgal)

PM10: (50 lbs PM10/Mgal)

SO2: is calculated based on 0.5% S in fuel

Calculation to be: (Fuel Rate, gals)  
(7.2 lbs/gal) (0.005/100) (64/32) = SO2

For Boiler:

NOx: (20 lbs NOx/Mgal)

CO: (5.0 lbs CO/Mgal)

PM10: (2.0 lbs PM10/Mgal)

POC: (0.2 lbs POC/Mgal)

SO2: is calculated based on 0.5% S in fuel

Calculation to be: (Fuel Rate, gals)  
(7.2 lbs/gal) (0.005/100) (64/32) = SO2

STEP 4.

| CALCULATED MONTHLY ~~AND DAILY~~ EMISSIONS

| To be kept by USS-Posco on a ~~monthly~~ ~~daily~~ record keeping basis.

The records which are required to be submitted to the District pursuant to Condition 2 on the entire modernization project may be submitted in the form of the attached summary sheets or in such other format as the Air Pollution Control Officer may approve.

End of Appendix A for permit condition # 7216

**RECOMMENDATION**

Issue a change of condition to USS-POSCO Industrial for the following:

**Permit Condition 7216**

**EXEMPTIONS**

none

By: \_\_\_\_\_  
Pamela J. Leong  
Air Quality Engineer II  
July 18, 2008

## APPENDIX G

### ENGINEERING EVALUATION APPLICATION 18407

**ENGINEERING EVALUATION**  
**USS-POSCO Industries**  
**PLANT NO. 2371**  
**APPLICATION NO. 18407**

**BACKGROUND**

USS-POSCO Industries (UPI) is applying for a modification to the Permit to Operate the following equipment:

S-174 KM Continuous Annealing Furnace, Natural Gas, 96 MMBtu/hr

UPI has proposed a modification to permit condition 7216, part F4, which limits emissions of NOx from S-174.

Current Condition

F. Conditions for S174

4. Excluding periods of cold startup and furnace idling, NOx emissions in the exhaust from this source shall meet one of the following:
  - a. Not exceed 10 ppmv at 3% oxygen, averaged over 3 consecutive hours;
  - b. Be reduced by at least a 90%, by weight, averaged over 3 consecutive hours, by the A32 Selective Catalytic Reduction (SCR) Unit; or
  - c. For a period when UPI is running a thin gauge coil (<0.0300 inch), NOx shall be reduced by at least 80%, by weight, averaged over three consecutive hours, by the A32 Selective Catalytic Reduction (SCR) Unit. If the duration of the thin gauge run is less than three hours, the averaging period shall be the entire run period.

(Basis: BACT, Cumulative increase)

Part 4c was originally added because the processing of thin gauge coil generally required lower annealing or furnace temperatures. With the lower furnace heat input level and therefore SCR temperature, the NOx control efficiency decreases. Part 4c allowed for a decrease in the SCR's NOx destruction efficiency from 90 to 80% when running thin gauge coil at S-174. It has since been recognized that depending upon the type of annealing required, thin gauge coil is sometimes processed at higher temperatures while thicker gauge coil (greater than 0.0300 inches) may need to be re-annealed at lower firing rates. Therefore, UPI has requested that the NOx control level and permitted NOx emission limit be based upon firing rate of S-174 instead of being based upon the gauge of the coil being processed. UPI has proposed the following language for Parts 4c and the addition of Part 4d.

Requested Condition Changes

F. Conditions for S174

4. c. For a period when UPI is running ~~a thin gauge coil (<0.0300 inch)~~ at a heat input level less than 50 kscf/hr, NOx shall be reduced by at least 80%, by weight, averaged over three consecutive hours, by the A32 Selective Catalytic Reduction (SCR) Unit. If the

duration of the ~~thin-gauge~~ low heat input run is less than three hours, the averaging period shall be the entire run period.

(Basis: BACT, Cumulative increase)

d. For a period when UPI is running at a heat input level less than 50 kscf/hr, NOx shall not exceed 18 ppmv at 3% oxygen averaged over 3 consecutive hours. If the duration of the low heat input run is less than three hours, the averaging period shall be the entire run period.

(Basis: BACT, Cumulative increase)

In addition, the firing rate will be lower than 50 kscf/hr during routine furnace startup and shutdown, during furnace idling, and during operation to maintain heat within the furnace. For example, there are times when the line is down with heavy gauge in the furnace waiting on standby to start back up. If the delay is short, the operator will fire the furnace at 20 kscf/hr to hold the heat. This is necessary for furnace life, cost, and quality of product. Per condition 7216, Part F3, the SCR does not need to be operated during a cold startup of the annealing furnace, not to exceed 3 hours, and during furnace idling. A cold startup includes periods when the SCR temperature is less than 392F and furnace idling includes periods when natural gas is being fired at a rate of less than 17 scfm (~1,000 scfh).

3. The Selective Catalytic Reduction Unit (SCR) shall be operated during all periods of the annealing furnace operation, with the exception of during a cold startup of the annealing furnace, which is not to exceed 3 hours, and during furnace idling. A cold startup includes periods when the SCR temperature is less than 392 F. Furnace idling includes periods when natural gas is being fired but at a rate of less than 17 scfm (approximately 1 thousand scfh).

(Basis: BACT, Cumulative increase)

Because Part F3 did not allow idling of the furnace greater than 1000 scf/hr (1 kscf/hr), in 2006 UPI received two dozen Reportable Compliance Activities (RCAs) and Notices of Violations (NOVs) with the District. Since then, to ensure compliance, operators have been shutting down all burners for downtimes lasting longer than 10 minutes. Therefore there have been no recent RCAs or NOVs, but shutting down the system is not efficient or practical for such a large furnace. Shutting down the burners can result in the SCR catalyst cooling down below the ammonia injection minimum temperature and therefore no corresponding NOx control during the following startup. UPI claims it will be more effective if the furnace were allowed to continue to operate during a line stop to keep the furnace and catalyst warm and minimize NOx emissions when the furnace is brought back up.

The permitted NOx emissions were calculated and compared with the requested NOx emissions limits to determine if there would be an increase in NOx. See Emissions Summary Section for detailed calculations.

	Condition	NOx Emissions
NOx Concentration Limits		
Existing Condition 7216, Part F4a	Maximum Firing Rate = 91.43 kscf/hr (96 MMBtu/hr) and 10 ppmv at 3% O2	1.16 lb/hr
Requested Condition 7216, Part F4d	Firing Rate = 50.00 kscf/hr (52.5 MMBtu/hr) and 18 ppmv at 3% O2	1.14 lb/hr (< 1.16 lb/hr)
NOx Abatement Requirements (assume unabated emissions are 100 lb/MMscf (AP-42 Table 1.4-1))		
Existing Condition 7216, Part	Maximum Firing Rate = 91.43	0.914 lb/hr

F4b	kscf/hr (96 MMBtu/hr) and NOx abatement 90% by weight	
Request Condition 7216, Part F4c	Firing Rate = 50.00 kscf/hr (52.5 MMBtu/hr) and NOx abatement 80% by weight	1.0 lb/hr (> 0.914 lb/hr)
Condition change that will result in NO INCREASE in emissions	Firing Rate = 50.00 kscf/hr (52.5 MMBtu/hr) and NOx abatement <u>82%</u> by weight	0.914 lb/hr (= 0.914 lb/hr)

So that there will be NO INCREASE in NOx emissions at S-174, Condition 7216, Part 4 will be changed as follows:

Condition Change Allowed (No increase in NOx emissions):

F. Conditions for S174

4. c. For a period when UPI is running a ~~thin gauge coil (<0.0300 inch)~~ at a heat input level less than 50 kscf/hr, NOx shall be reduced by at least ~~80~~ 82%, by weight, averaged over three consecutive hours, by the A32 Selective Catalytic Reduction (SCR) Unit. If the duration of the ~~thin gauge~~ low heat input run is less than three hours, the averaging period shall be the entire run period.

d. For a period when UPI is running at a heat input level less than 50 kscf/hr, NOx shall not exceed 18 ppmv at 3% oxygen averaged over 3 consecutive hours. If the duration of the low heat input run is less than three hours, the averaging period shall be the entire run period.

(Basis: BACT, Cumulative increase)

**EMISSIONS SUMMARY**

**Emissions:**

Concentration Limits:

***Current NOx Emission Limit: 10ppmv at 3% O2 = 0.0121 lb/MMBtu***

***Requested NOx Emission Limit: 18 ppmv at 3%O2 when the heat input to S-174 is less than 50 kscf/hr***

***18 ppmv at 3% O2 = 0.0217 lb/MMBtu***

***50 kscf/hr = 52.50 MMBtu/hr***

***Current Emissions of NOx = (0.0121 lb/MMBtu)(96 MMBtu/hr) = 1.16 lb/hr***

***Requested Emissions of NOx = (0.0217 lb/MMBtu)(52.50 MMBtu/hr) = 1.14 lb/hr***

***Emissions of NOx at 18 ppmv at 3% O2 at 52.5 MMBtu/hr (50 kscf/hr) of 1.14 lb/hr are less than that at 10 ppmv at 3% O2 at 96 MMBtu/hr of 1.16 lb/hr and the requested permit condition, Part F4d, will be allowed.***

**NOx Abatement Requirements:**

***Permit condition 7216 requires NOx emissions to be reduced by at least 90% by weight. UPI is requesting a NOx reduction of 80% when the heat input to S-174 is less than 50 kscf/hr.***

***EPA AP-42 Table 1.4-1 gives an emission factor for uncontrolled emissions of NOx of 100 lb/1E6 scf.***

***96 MMBtu/hr = 91.429 kscf/hr***

***Current Emissions of NOx = (100 lb/1E6 scf)(91,429 scf/hr)(1-0.9 abatement) = 0.914 lb/hr***

***Requested Emissions of NOx = (100 lb/1E6 scf)(50,000 scf/hr)(1-0.8 abatement) = 1.000 lb/hr***

***Emissions of NOx at a reduction of 80% by weight could potentially result in an increase of NOx. To ensure that emissions of NOx do not increase, a reduction of 82% by weight will be required.***

***Emissions of NOx at a reduction of 82% by weight = (100 lb/1E6 scf)(50,000 scf/hr)(1-0.82 abatement) = 0.900 lb/hr***

***Plant Cumulative Increase:***

***With the permit condition changes, there will be no increase in emissions.***

**Toxic Risk Screening:**

There will be no increase in emissions and a risk screening analysis is not required per Regulation 2-5.

## **STATEMENT OF COMPLIANCE**

The owner/operator of S-174 KM Continuous Annealing Furnace shall comply with Reg. 6 (Particulate Matter and Visible Emissions Standards) and Reg. 9-1-301 (Inorganic Gaseous Pollutants: Sulfur Dioxide for Limitations on Ground Level Concentrations). The owner/operator is expected to comply with Regulation 6 since the unit is fueled with natural gas. Thus for any period aggregating more than three minutes in any hour, there should be no visible emission as dark or darker than No. 1 on the Ringlemann Chart (Regulation 6-301) and no visible emission to exceed 20% opacity (Regulation 6-302). Sulfur oxides are also very low since natural gas is being used. Sulfur compounds are removed from natural gas at processing plants. The owner/operator complies with Regulation 6-310. Total PM emissions in AP-42 Table 1.4-1 for natural gas fired heaters less than 100 MMBtu/hr is 7.6 lb/1E6 scf, which is 0.05 gr/dscf, which meets the limit of 0.15 gr/dscf in Regulation 6.310.

The project is considered to be ministerial under the District's CEQA regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emissions factors and therefore is not discretionary as defined by CEQA. (Permit Handbook Chapter 2.1 for Boilers, Steam Generators, and Process Heaters)

***The project is over 1000 feet from the nearest school and therefore not subject to the public notification requirements of Reg. 2-1-412.***

**Offsets:** There is no emission increase with this application and offsets do not apply.

PSD, NSPS, and NESHAPS do not apply.

## PERMIT CONDITIONS

*The changes to permit condition 7216, Part 4 are in strikeout/underline format.*

COND# 7216 -----

For S65 - ZINC COATING POT  
S166 - PICKLING LINE COIL PROCESSOR  
S167 - PICKLING LINE BUTT WELDER  
S168 - PICKLING LINE STRETCH LEVELER  
S169 - ACID PICKLING LINE  
S171 - TANDEM COLD MILL  
S173 - HCD ALKALINE CLEANER  
S174 - KM CONTINUOUS ANNEALING FURNACE  
S176 - ROLL ETCH MACHINE  
S177 - IRON OXIDE PRODUCTION ROASTER  
S178 - IRON OXIDE SILO #1  
S179 - IRON OXIDE BAGGING STATION  
S180 - ACID GAS ABSORBER #1  
S181 - ACID GAS ABSORBER #2:  
S182 - IRON OXIDE SILO #2:

(Amended 7/95, AN 14797; 11/96, AN 16832; 5/97, AN 16977; 2/99, AN 19031; 5/02, AN 32; 2/03, AN 6628)  
Application 18406 (August 2008): Update line-haul rail emission factors, update rail fuel usage factors, and remove daily cargo carrier recordkeeping and emission calculation **requirements.**

Application 18407 for S-174 (November 2008): Change NOx reduction requirement to 82% based on heat input of furnace (< 50 kscf/hr) instead of gauge of coil (< 0.0300 inches) in Part 4Fc. Add part 4d, NOx limit of 18 ppmvd at low heat input of furnace (< 50 kscf/hr).

### F. Conditions for S174

1. In no event shall the combined daily emissions from S174 and S177 exceed 100 lbs/day of nitrogen oxides (measured as NO<sub>2</sub>).  
(Basis: BACT, Cumulative increase)
2. For the purpose of demonstrating compliance with part F. 4 a, b, and c for S174, UPI shall install, calibrate and operate District approved continuous in-stack emission monitors and recorders for oxides of nitrogen, and either oxygen or carbon dioxide. Daily emissions shall be reported to the District on a monthly basis, the format of which shall be subject to approval by the APCO.  
(Basis: Regulation 1-521)



3. The Selective Catalytic Reduction Unit (SCR) shall be operated during all periods of the annealing furnace operation, with the exception of during a cold startup of the annealing furnace, which is not to exceed 3 hours, and during furnace idling. A cold startup includes periods when the SCR temperature is less than 392 F. Furnace idling includes periods when natural gas is being fired but at a rate of less than 17 scfm (approximately 1 thousand scfh).  
(Basis: BACT, Cumulative increase)
  
4. Excluding periods of cold startup and furnace idling, NOx emissions in the exhaust from this source shall meet one of the following:
  - a. Not exceed 10 ppmv at 3% oxygen, averaged over 3 consecutive hours;
  - b. Be reduced by at least a 90%, by weight, averaged over 3 consecutive hours, by the A32 Selective Catalytic Reduction (SCR) Unit; or
  - c. For a period when UPI is running ~~a thin gauge coil (<0.0300 inch)~~ at a heat input level less than 50 kscf/hr, NOx shall be reduced by at least ~~8082%~~, by weight, averaged over three consecutive hours, by the A32 Selective Catalytic Reduction (SCR) Unit. If the duration of the ~~thin gauge~~ low heat input run is less than three hours, the averaging period shall be the entire run period.
  - d. For a period when UPI is running at a heat input level less than 50 kscf/hr, NOx shall not exceed 18 ppmv at 3% oxygen averaged over 3 consecutive hours. If the duration of the low heat input run is less than three hours, the averaging period shall be the entire run period.

(Basis: BACT, Cumulative increase)

## RECOMMENDATION

Issue a change of condition to the Permit to Operate to USS-POSCO Industrial for the following:

S-174 KM Continuous Annealing Furnace, Natural Gas, 96 MMBtu/hr

## EXEMPTIONS

none

By: \_\_\_\_\_

Pamela J. Leong  
Air Quality Engineer II  
November 10, 2008

## APPENDIX H

### ENGINEERING EVALUATION APPLICATION 18718

**ENGINEERING EVALUATION**  
**USS-POSCO Industries**  
**PLANT NO. 2371**  
**APPLICATION NO. 18718**

**BACKGROUND**

USS-POSCO Industries (UPI) is applying for a modification to the Permit to Operate the following equipment:

A-41 ETL Enforcer III Scrubber #1 with HEPA Filters: MAPCO Retro-fit Final Stage ULPA Filter Assembly abating S-82 #1 Electro-Tinning Line – Chemical Treatment Section and S-155 #1 Electro-tinning (tin free cell)

A-42 ETL Enforcer III Scrubber #2 with HEPA Filters: MAPCO Retro-fit Final Stage ULPA Filter Assembly abating S-93 #3 Electro-Tinning Line – Chemical Treatment Section

UPI plans to install HEPA filters to comply with the new Air Resources Board (ARB) Air Toxic Control Measure (ATCM) for Chromium Plating and Chromic Acid Anodizing Facilities (Title 17, CCR Sections 93102 through 93102.16). Currently, UPI is required to meet a hexavalent chromium emission limit of 0.006 mg/amp-hr after abatement. By October 27, 2009, Table 93102.4 of the ATCM limits hexavalent chromium emissions to 0.0015 mg/amp-hr after add-on air pollution control device(s). To meet this limit, UPI will install the HEPA filters on the chemical treatment phase of the electro-tinning lines, S-82 and S-155 at Line No.1 and S-93 at Line No. 3. Both Lines No.1 and Line No. 2 are currently abated by MAPCO Enforcer III High Efficiency Scrubbers, A-41 and A-42. UPI will modify the scrubbers with the addition of HEPA filters as a third element to these existing control devices to comply with the upcoming lower hexavalent chromium emission standard. The HEPA filters are vertical, high performance “Final” chrome mist eliminator stage sized for 18,000 CFM at 1.5” static pressure. The filters are designed for 99.9995% removal of particulate to 0.12 micrometers.

UPI will source test the electro-tinning lines (S-82, S-155, and S-93) abated by the scrubbers outfitted with the HEPA filters (A-41 and A-42) after installation to ensure they comply with the new hexavalent chromium limit of 0.0015 mg/amp-hr. As required by the ATCM (footnote 3 of Table 93102.4), if annual emissions exceed 15 grams, “a site specific risk analysis must be conducted by the owner or operator in accordance with the permitting agency’s procedures, unless a site specific risk analysis has already been conducted and approved by the permitting agency. The analysis shall be submitted to the permitting agency.” If results of the source test show that emissions of hexavalent chrome exceed the 15 grams/yr, UPI plans to have Sierra Research perform the Risk Analysis and present the findings to the District. In addition, the BAAQMD Toxics Group in the Engineering Department will need to perform an independent Risk Screen Analysis.

The ATCM also allows for the “Demonstration of Compliance by an Alternative Method or Methods” in Section 93102.4(b)(3). The technical contact person for the ATCM for Chromium Plating and Chromic Acid Anodizing Facilities, Carla Takemoto, Manager in the Toxics Evaluation Section at the ARB, was contacted to clarify the requirements to demonstrate compliance by alternative methods. If UPI does not meet the 0.0015 mg/amp-hr limit, UPI may meet the requirements of the ATCM by showing that they meet the Risk Management Guidelines of the permitting agency. Therefore, if UPI passes a risk screen with the BAAQMD, then UPI is considered to meet the requirements of the ATCM. After startup source tests, if UPI does not meet the 0.0015 mg/amp-hr limit, UPI plans to have Sierra Research perform a Risk Analysis and present the findings to the District. The BAAQMD Toxics Group in the Engineering Department will also need to perform an independent Risk Screen Analysis.

**EMISSIONS SUMMARY**

**Annual Emissions:**

***Addition of the HEPA filters to the abatement devices (A-41 and A-42) on the electro-tinning lines (S-82, S-155, and S-93) will not result in an increase in emissions. The HEPA filters are***

***being added to reduce emissions to meet the hexavalent chromium emission limit that is being reduced from 0.006 mg/amp-hr to 0.0015 mg/amp-hr in the ATCM.***

*Plant Cumulative Increase:*

***Addition of the HEPA filters to the abatement devices (A-41 and A-42) on the electro-tinning lines (S-82, S-155, and S-93) will not result in an increase in emissions. The HEPA filters are being added to reduce emissions to meet the hexavalent chromium emission limit that is being reduced from 0.006 mg/amp-hr to 0.0015 mg/amp-hr in the ATCM.***

**Toxic Risk Screening:**

There will be no increase in emissions and a risk screening analysis is not required per Regulation 2-5.

## **STATEMENT OF COMPLIANCE**

The owner/operator shall comply with the General Provisions of Regulation 1-301. UPI shall not discharge from any source whatsoever such quantities of air contaminants or other material, which cause injury, detriment, nuisance or annoyance to the public. The owner/operator shall continue to comply with Regulation 6: Particulate Matter and Visible Emissions. UPI is installing the HEPA filters in order to meet the requirements of Regulation 11-8: Hazardous Pollutants, Hexavalent Chromium Airborne Toxic Control Measure for Chrome Plating and Chromic Acid Anodizing Operations. Regulation 8-11 incorporates the standards for the ATCM (Title 17, CCR Sections 93102 through 93102.16)

The project is considered to be ministerial under the District's CEQA regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emissions factors and therefore is not discretionary as defined by CEQA. (Permit Handbook Chapters 10.1).

***The project is over 1000 feet from the nearest school and therefore not subject to the public notification requirements of Reg. 2-1-412.***

**Best Available Control Technology:** In accordance with Regulation 2, Rule 2, Section 301, BACT is triggered for any new or modified source with the potential to emit 10 pounds or more per highest day of POC, NPOC, NO<sub>x</sub>, CO, SO<sub>2</sub> or PM<sub>10</sub>. Emissions will not increase as a result of this application and BACT is not triggered.

**Offsets:** There is no emission increase with this application and offsets do not apply.

PSD, NSPS, and NESHAPS do not apply.

## **PERMIT CONDITIONS**

***The owner/operator is subject to permit condition 7579 for the electro-tinning lines. Changes to the permit condition are in strikeout/underline format.***

COND# 7579 -----

Application 18718 (September 2008): Addition of HEPA filters to A-41 and A-42 in order to meet the new hexavalent chromium limit in the ATCM of 0.0015 mg/amp-hr after abatement.

For S82, 93, 155 - Electro-Tinning Lines:

1. Throughput

The total annual combined throughput at sources S82, S93, and S155 shall not exceed 114.5 million amp-hr in any consecutive twelve month period.  
(Basis: Voluntary Limit)

2. Abatement

This source shall not be operated unless emissions are vented to either A41 or A42, Mapco Enforcer III High Efficiency Scrubber with HEPA filters.  
(Basis: Regulation 11-8, Section 93102 (c)(2))

3. Emission Limits

Emissions of hexavalent chromium shall not exceed the following, after abatement:

- a) 0.006 mg/amp-hr
  - b) 0.0015 mg/amp-hr, effective 10/27/09, except as allowed by Part 7.
- (Basis: Regulation 11-8, Section 93102.4(a)(1)(A) and (b)(1))

4. Source Test

Source Testing Protocol: A written source test protocol shall be submitted to the Source Test Group for District approval prior to conducting any source test for compliance. This source test protocol shall include testing methods, length of sample period, sampling equipment and methods, as well as the planned date for the source test.  
(Basis: Regulation 11-8, Section 93102.7(c))

5. Record Keeping

To comply with the above parts, monthly records of current applied to this source integrated over time, in units of amp-hrs, and records of chemical addition to the source shall be kept (onsite) and maintained. Such records shall be submitted to the BAAQMD on an annual basis via the annual update program. These records shall be maintained at the plant site for at least five years.  
(Basis: Regulation 11-8, Section 93102.9)

6. In order to demonstrate compliance with the emission limit in part 3, the owner/operator of this equipment shall conduct District approved source testing of both

scrubber systems with HEPA filters every two years. The initial source test required by this part shall be conducted no later than 60 days after the startup of A-41 and A-42 with the new HEPA Filters. Subsequent testing shall be performed no later than 24 months from the previous test. The Source Test Group of the District shall be contacted to obtain approval of the source test procedures at least 14 days in advance of each source test. The Source Test Group shall be notified of the scheduled test date at least 7 days in advance of each source test. The source test report shall be submitted to the Source Test Group within 45 days of the test date.

*(basis: Regulation 2-1-304)*

*7. If the owner/operator does not meet the limit in Part 3 and/or annual emissions of hexavalent chromium exceed 15 grams per year, a site specific risk analysis must be conducted by the owner/operator in accordance with the BAAQMD procedures. The owner/operator shall meet the District's Project Risk Requirement of Regulation 2-5. Data must be provided to the District Engineering Division to perform an independent risk analysis.  
(basis: Regulation 8-11, Table 43102.4 Footnote 3, Section 43102(b)(3), Regulation 2-5)*

## RECOMMENDATION

Issue an Authority to Construct for to USS-POSCO Industrial for modification to the following:

A-41 ETL Enforcer III Scrubber #1 with HEPA Filters: MAPCO Retro-fit Final Stage ULPA Filter Assembly abating S-82 #1 Electro-Tinning Line – Chemical Treatment Section and S-155 #1 Electro-tinning (tin free cell)

A-42 ETL Enforcer III Scrubber #2 with HEPA Filters: MAPCO Retro-fit Final Stage ULPA Filter Assembly abating S-93 #3 Electro-Tinning Line – Chemical Treatment Section

## EXEMPTIONS

none

By: \_\_\_\_\_  
Pamela J. Leong  
Air Quality Engineer II  
September 25, 2008

## APPENDIX I

### ENGINEERING EVALUATION APPLICATION 19114

**ENGINEERING EVALUATION REPORT**

<b>PLANT NAME</b>	<b>USS Posco Industries, Inc</b>
<b>APPLICATION NUMBER</b>	<b>19114</b>
<b>PLANT NUMBER</b>	<b>2371</b>
<b>DATE</b>	<b>11-13-2008</b>

**1. BACKGROUND**

On October 24, 2007, a major revision to the Airborne Toxic Control Measure (ATCM) for Chromium Plating and Chromic Acid Anodizing became law in California. As a result, the permit conditions for the District chrome platers (there are no chromic acid anodizers operating in the BAAQMD) need to be revised to address these changes. Following is a listing of the sources involved and the current and revised condition numbers. The ATCM can be found at the following website: <http://www.arb.ca.gov/toxics/atcm/chroatcm.pdf>

Source	Old Cond	New Cond	Bath Control	Abatement-1	Abatement-2
82	7579	7579	None	A-41 Mapco/HEPA	n/a
93	"	"	"	A-42 Mapco/HEPA	"
155	"	"	"	A-41 Mapco/HEPA	"

District regulations allow the APCO to make changes of permit conditions, based on certain criteria, enumerated in Reg 2-1-403:

**Permit Conditions:** *Except as to permit applications reviewed in accordance with Section 2-1-311, the APCO may impose any permit condition that he deems reasonably necessary to insure compliance with federal or California law or District regulations. For any permit application which was reviewed as a ministerial project in accordance with Section 2-1-311, the APCO shall only impose permit conditions as set forth in the District's Permit Handbook for the type of source being permitted. The APCO may require the installation of devices for measurement or analysis of source emissions or ground-level concentrations of air contaminants.*

The proposed condition changes are to ensure compliance with the Chrome Plating ATCM, revised 10-24-2007.



## 2. EMISSION CALCULATIONS

The new permitted emission level will be 0.0015 mg/a-hr. Hence the following shows the permitted hex chrome emission rates before and after the permit condition modification.

Basis	Throughput, a-hr/yr	Factor, mg/a-hr	Emissions, lb/yr
Current	114,500,000	0.006	1.51
Post-ATCM	114,500,000	0.0015	0.378
Net Difference	0	0.0045	1.13

## 3. CEQA

Since the change of conditions will result in a decrease in the permitted emission levels, this application is exempt from CEQA review per Reg 2-1-312.1.

## 4. BEST AVAILABLE CONTROL TECHNOLOGY

*Emissions are decreasing, therefore BACT is not applicable.*

## 5. EXEMPTIONS

There are no applicable exemptions.

## 6. OFFSETS

Offsets are not applicable, since emissions decrease, therefore no offset triggers are exceeded.

## 7. TOXIC EVALUATION

Permitted emission levels decrease, therefore no toxic evaluation is required. Previous toxic risk evaluations have been conducted showing there are no significant risks to any member of the public from these operations. It should be noted that the risks were less than 10 in a million at the previous emission level, 1.51 lb/yr. We would therefore expect the risk at the new control level to remain below 10 in a million.

## 8. STATEMENT OF COMPLIANCE

The purpose of revising the permit conditions is to ensure that the facility complies with the newly revised air toxic control measure.

## 9. CONDITIONS

The previous version of Condition 7579 is presented in this application, as is the revised Condition 7579.

## 10. RECOMMENDATIONS

Issue a Change of Condition letter for the aforementioned sources, subject to the revised Condition 7579.

### OLD CONDITION 7579

COND# 7579 -----

For S82, 93, 155 - Electro-Tinning Lines:

#### 1. Throughput

The total annual combined throughput at sources S82, S93, and S155 shall not exceed 114.5 million amp-hr in any consecutive twelve month period.  
(Basis: Voluntary Limit)

#### 2. Abatement

This source shall not be operated unless emissions are vented to either A41 or A42, Mapco Enforcer III High Efficiency Scrubber.  
(Basis: Regulation 11-8, Section 93102 (c)(2))

#### 3. Emission Limits

Emissions of hexavalent chromium shall not exceed 0.006 mg/amp-hr after abatement.  
(Basis: Regulation 11-8, Section 93102 (c)(2))

#### 4. Source Test

Source Testing Protocol: A written source test protocol shall be submitted for District approval prior to conducting any source test for compliance. This source test protocol shall include testing methods, length of sample period, sampling equipment and methods, as well as the planned date for the source test.

(Basis: Regulation 11-8, Section 93102 (d)(4))

#### 5. Record Keeping

To comply with the above parts, monthly records of current applied to this source integrated over time, in units of amp-hrs, and records of chemical addition to the source shall be kept (onsite) and maintained. Such records shall be submitted to the BAAQMD on an annual basis via the annual update program. These records shall be maintained at the plant site for at least five years.

(Basis: Regulation 11-8, Section 93102 (h)(4)(A))

6. In order to demonstrate compliance with the emission limit in part 3, the owner/operator of this equipment shall conduct District approved source testing of both scrubber systems every two years. The initial source test required by this part shall be conducted no later than July 1, 2004. Subsequent testing shall be performed no later than 24 months from the previous test. The Director of the Compliance and Enforcement Division of the District shall be contacted to obtain approval of the source test procedures at least 14 days in advance of each source test. The Director of the Compliance and Enforcement Division shall be notified of the scheduled test date at least 7 days in advance of each source test. The source test report shall be submitted to the Compliance and Enforcement Division and to the Director of the Compliance and Enforcement Division within 45 days of the test date.

(basis: Regulation 2-1-304)

#### **NEW CONDITION 7579**

COND# 7579 -----

Application 18718 (September 2008): Addition of HEPA

Filters to A-41 and A-42 Mapco Enforcer III Units. The owner/operator shall comply with the following Conditions for Sources 82, 93 and 155 Chrome Plating Tanks. Basis refers to either BAAQMD Regulations/Rules or California Code of Regulations, Title 17, Section 93102 - 93102.16 and associated appendices, unless otherwise noted.

1. Performance Standards

a) Emission Limits effective through 10-23-2009:

Emissions of hexavalent chromium shall not exceed 0.006 mg per ampere-hour (mg/amp-hr) after abatement. [Basis: 93102.4(a)(1)]

b) Emission Limits effective 10-24-2009:

Emissions of hexavalent chromium shall not exceed 0.0015 mg per ampere-hour (mg/amp-hr) after abatement. [Basis: 93102.4(b)(1)]

c) Throughput: The total annual combined throughput at S-82, S-93, and S-155 shall not exceed 114.5 million ampere-hours in any consecutive 12-month period. [Basis: 93102.4(b)(1)]

d) The requirements of Parts 1a and 1b of this condition and the O&M Plan provisions do not apply during periods of equipment breakdown, provided the provisions of the District's breakdown rules are met. [Basis: 93102.2(b)]

2. Abatement

a) The owner/operator shall abate at all times during operation of S-82, S-93, and S-155 with plating tank emissions vented through A-41 and/or A-42. A-41 and A-42 are identified as Mapco Enforcer III Scrubber units with HEPA filtration elements.

The ventilation and abatement system shall be properly maintained and kept in good working condition.

3. Source Test

- a) The owner/operator shall perform a source test by October 24, 2009 to demonstrate compliance with the emission performance standard specified in part 1b.

An existing District-approved source test may be used to demonstrate compliance with this part, as long as the existing source test was conducted in accordance with ATCM Section 93102.7(b) & (c).  
[Basis: 93102.7(a)(1)(A)]

- b) The owner/operator shall perform source tests to demonstrate compliance according to the following schedule:

- i. Unless Part 3.b)ii. is satisfied, subsequent source testing shall be performed no later than 36 months after the date of the

previous

District-approved source test demonstrating compliance.

- ii. If the previous two consecutive source tests demonstrate compliance, the subsequent tests shall be performed no later than 48 months after the previous source test.

compliance,

- iii. If a source test demonstrates non-

then the owner/operator must perform another source test to demonstrate compliance. Subsequent source tests to demonstrate compliance shall be performed no later than 24 months after the previous source test.

If

after two consecutive source tests at the 24 month frequency, both of which demonstrate compliance, the source test frequency

reverts

to the original schedule in Part 3.b)i.

- c) Non-compliant source test: After conducting a source test which demonstrates non-compliance the owner/operator shall review and adjust or repair

the

plating operation and associated emission control system. A source test to demonstrate compliance shall be performed no later than 30 days after the

chrome plating system adjustments/repairs are completed.

- d) Any chrome plating bath that is non-operational at the time a source test is due does not have to be tested at that time. Upon subsequent start-up of any such bath, a source test shall be conducted within 30 days.
- e) Source Testing Protocol: A written source test protocol based on 93102.7(c) shall be provided for District approval prior to conducting any source test for compliance. This source testing protocol shall include testing methods, length of sample period, plating facilities to be operated during source test, sampling equipment and methods, as well as the planned date for the source test.

the  
well

For the purpose of maintaining ongoing compliance, the following parameters shall be monitored and recorded at the listed frequency during the source testing period:

- i. A-41 & A-42 Mapco Scrubber unit(s): record pressure drop at least one time every 15 minutes of operation.
- ii. A-41 & A-42 HEPA filter elements: record pressure drop at least one time every 15 minutes of operation.

Source

- f) The owner/operator shall contact the District Test Section at least 14 days in advance of the source test or as directed by the ATCM to obtain approval of the test protocol. The owner/operator shall notify the District Source Test Section at least 7 days in advance of each scheduled source test. [Basis: 93102.7]

#### 4. Training

No later than October 24, 2009, and within every two calendar years thereafter, the owner or operator shall ensure that hexavalent chrome based plating operations

(including environmental compliance/recordkeeping) are under the direction of the owner or operator or current

employee who is onsite and has completed the ARB Compliance Assistance Training Course for chrome plating and anodizing. [Basis: 93102.5(b)]

#### 5. Housekeeping

The following housekeeping requirements shall be implemented to reduce potential hexavalent chrome fugitive emissions: [Basis: 93102.5(c)]

- a) Chromic acid materials shall be stored in a closed container in an enclosed storage area.
- b) Chromic acid materials shall be transported from storage to the bath in a closed container.
- c) Any liquid or solid hexavalent chrome containing material that is spilled shall be contained or cleaned up within one hour after being spilled.
- d) Surfaces within the chrome storage area and the walkways and other areas potentially contaminated with hexavalent chrome, shall be cleaned at least one time every seven days by either HEPA vacuuming, damp cloth hand wiping, wet mopping, use of non-toxic dust suppressants or any other District-approved method.
- e) Chromium containing wastes generated as a result of any of the above housekeeping activities shall be stored, disposed of, recovered, or recycled using practices that minimize fugitive dust.

#### 6. Monitoring

- a) Each rectifier shall be hard-wired to a single non-resettable meter which records ampere-hours continuously during rectifier operation. Each ampere-hour meter shall be installed and maintained per manufacturer's specifications. The owner/operator shall record the total ampere-hours used during each month.  
[Basis: 93102.10(a), 93102.12(c)(1)]

b) A-41/A-42 Mapco Scrubber Pressure Drop: The owner/operator shall continuously monitor the pressure drop across A-41 and A-42 Mapco Enforcer III Scrubber unit. The pressure drop shall be maintained within plus or minus 2 inches of water of the value established during the most recent source test to demonstrate compliance with the emission limitations of Part 1. Pressure drop readings shall be recorded at a frequency of at least one time per operating week. [Basis: 93102.9(b), 9102.12(c)(2)]

c) A-41/A-42 HEPA Filter Element Pressure Drop: The owner/operator shall continuously monitor the pressure drop across A-41 and A-42 HEPA filter elements. The pressure drop shall be maintained within minus  $\frac{1}{2}$  times to +2 times the inches of water of the value established during the most recent source test to demonstrate compliance. Pressure drop readings shall be recorded at a frequency of at least one time per operating week. [Basis: 93102.9(b), 93102.12(c)(2)]

## 7. Operation & Maintenance (O&M) Plan

The owner/operator shall prepare an operation and maintenance plan for the chrome plating operation, which shall be retained onsite and made available for inspection upon request. Any revisions to the O & M Plan shall be documented in an addendum and all versions shall be maintained for a period of 5 years after each revision to the plan. The O&M Plan shall

at a minimum include:

- a) The inspection and maintenance requirements for the air pollution control equipment and amp-hr meters/totalizers. [Basis: 93102.11]
- b) A checklist to document the inspection, operation and maintenance for the chrome plating operation, including steps to be taken to correct operating



deficiencies. [Basis: 93102.11]

8. Inspection & Maintenance Frequency

a) The owner/operator shall perform visual inspections of the abatement systems and associated ductwork pursuant to ATCM Section 93102.10(a) at least once

per calendar quarter and conduct wash downs of the Mapco Enforcer III unit per manufacturer recommendations. [Basis: 93102.10(a) and Reg 2-5]

b) In order to demonstrate compliance with Part 8a, the owner/operator shall record the equipment being inspected, date, brief description of the working condition of the device during the inspections, any maintenance activities performed on the components of the air pollution control systems, and any actions taken to correct deficiencies found during the inspection.

9. Recordkeeping

The owner/operator shall maintain the following records for at least five years, with the most recent two years maintained onsite.

a) Inspection Records to demonstrate that such inspections were done in accordance with the provisions of Section 93102.10 and the O&M Plan. Such records can take the form of a checklist and shall identify the devices inspected, the date and time of the inspection, a brief description of the working condition and any corrective actions.

b) The owner/operator shall:  
[Basis: 93102.12]

- i. Record monthly and cumulative 12-month rectifier ampere-hour totals, and
- ii. Record the pressure drop across the abatement device(s) at least once per operating week.

- c) Breakdown Records noting the occurrence, duration, cause (if known), and action taken.
- d) Records of excesses of the emission limitations set forth in Part 1 or the monitoring parameters established under Part 6 noting any exceedances of the ampere-hour throughput or pressure drop limits.
- e) Housekeeping Records demonstrating compliance with Part 3, above, including date and time of housekeeping activity.

#### 10. Reporting

- a) Source Test Reports: The owner/operator shall report source test results used to demonstrate compliance to the District Source Test Section no later than 60 days after the test date. The

content

of the source test reports shall contain the information identified in Appendix 1 of the applicable ATCM. Source test records shall be maintained onsite at the facility and made

available

to the District upon request, for a period of 5 years from the date of the source test.

[Basis: 93102.13(a)]

- b) Annual Compliance Status Report: The owner/operator

shall submit an annual compliance status report to the District on or before February 1, and shall include the following information for the preceding calendar year.

The content of the ongoing status shall include the information identified in Appendix 3 of the applicable ACTM. The report shall contain the

name,

title and signature of the responsible official who is certifying the accuracy of the report.

[Basis: 93102.13(c)]

## APPENDIX J

### ENGINEERING EVALUATION APPLICATION 19679

**Evaluation Report**  
**A/N 19679**  
**G# 6331 (Plant 2371, Source 158)**  
**USS POSCO, 900 Loveridge Rd., Pittsburg**

**Background**

USS-POSCO has applied for an A/C to remove the Phase II equipment from their existing gasoline dispensing facility under the low throughput exemption of Section 8-7-112.5. No other work is proposed under this application.

USS-POSCO currently operates a 10,000 gallon underground gasoline tank with one EW A4005 gasoline nozzle equipped with OPW EVR two-point Phase I and balance Phase II vapor recovery equipment. This equipment is permitted as Source 158 at Plant 2371 and is subject to condition #23007, which limits annual gasoline throughput to 150,000 gallons per year and #20666 for the OPW EVR Phase I system.

USS-POSCO is proposing to replace the vapor recovery nozzle and hose with conventional (i.e., non-vapor recovery) models and cap off the vapor return piping. All other equipment will remain unchanged. Once this project is completed, USS POSCO will be exempt from Phase II vapor recovery requirements. They will not be subject to the April 1, 2009 for installing EVR-certified Phase II vapor recovery equipment.

**Emissions**

The fleet refueled at this facility consists primarily of non-ORVR equipped vehicles. Removing the Phase II vapor recovery will result in an emissions increase.

Emission factors from the CAPCOA Industry-Wide Risk Assessment:

Phase I w/vent valves:	9.3# VOC/Mgal
Phase I, Phase II, vent valves	1.27 #VOC/Mgal

This site is currently limited to 150,000 gal/yr. USS Posco has requested that this limit be reduced to 26,107 gal/yr. This will result in the following emissions increase:

(26.1 Mgal/yr) (9.3 #/Mgal) - (150 Mgal/yr) (1.27 #/Mgal)  
= 52.2 # VOC/yr increase

**New Source Review**

The emissions increase from this project is less than 10 # VOC/day. Per Section 2-2-301, BACT is not required for this project.

USS Posco has a cumulative increase > 35 tpy POC. Per Section 2-2-302, they are required to provide emissions offsets for any increase at a 1.15:1 ratio.

Required offsets: (52.2 # VOC) (1.15) = 60 # VOC offsets

In a letter dated February 27, 2009, USS POSCO authorized the District to deduct 0.03 tons (60#) of POC emission reduction credits from Banking Certificate #644.

**Statement of Compliance**

USS POSCO has submitted data demonstrating that this storage tank was installed prior to March 4, 1987, agreed to accept a condition limiting throughput to less than 60,000 gal/yr, and accept conditions on their A/C to remove the Phase II vapor recovery equipment to the APCO's satisfaction. This satisfies the requirements of Section 8-7-112.7.

**Permit Conditions**

*Authority to Construct Conditions:*

**Cond #24279**

1. All vapor-recovery nozzles, breakaways and hoses shall removed and replaced with conventional (non-vapor recovery) equivalents.
2. Vapor adaptors shall be removed from all dispensers.
3. All vapor recovery piping (including internal dispenser piping) shall be either removed or capped with NPT galvanized pipe.
4. Within ten(10) days of start-up, a Leak Test shall be performed on the tanks in accordance with the District's Manual of Procedures Source Test Procedure ST-30. If the tank size is 500 gallons or less, the test shall be performed on an empty tank.
5. The applicant shall notify Source Test by email at [gdfnotice@baaqmd.gov](mailto:gdfnotice@baaqmd.gov) or by FAX at (510) 758-3087, at least 48 hours prior to any testing required for permitting. Test results for all performance tests shall be submitted in a District-approved format within thirty days of testing. Start-up tests results submitted to the District must include the application number and the GDF number. (For annual test results submitted to the District, enter "Annual" in lieu of the application number.) Test results may be submitted by email ([gdfresults@baaqmd.gov](mailto:gdfresults@baaqmd.gov)), FAX (510) 758-3087) or mail (BAAQMD Source Test Section, Attention Hiroshi Doi, 939 Ellis Street, San Francisco CA 94109).

*Permit to Operate Conditions*

COND# 24278 -----

This facility's annual gasoline throughput shall not exceed 26,107 gallons in any consecutive 12 month period. (Basis: Voluntary Limit)

COND# 20666 -----

1. The OPW EVR Phase I Vapor Recovery System, including all associated plumbing and components, shall be operated and maintained in accordance with the most recent version of California Air Resources Board (CARB) Executive Order VR-102. Section 41954(f) of the California Health and Safety Code

prohibits the sale, offering for sale, or installation of any vapor control system unless the system has been certified by the state board. (District Regulation 8-7-301.2)

2. The owner or operator shall conduct and pass a Rotatable Adaptor Torque Test (CARB Test Procedure TP201.1B) and either a Drop Tube/Drain Valve Assembly Leak Test (TP201.1C) or, if operating drop tube overflow prevention devices ("flapper valves"), a Drop Tube Overflow Prevention Device and Spill Container Drain Valve Leak Test (TP201.1D) at least once in each 36-month period. Measured leak rates of each component shall not exceed the levels specified in VR-102. Results shall be submitted to BAAQMD within 15 days of the test date in a District-approved format. (District Regulation 8-7-301.2)

**Title V Permit Revisions**

This plant has a Title V permit. This project will require a minor revision of the Title V permit. The BAAQMD plant engineer for USS Posco has been advised of the need for amendments to the Title V permit.

Proposed revisions to the Title V permit are attached.

**Recommendation**

All fees have been paid. Recommend that an A/C be issued for the above project.

By \_\_\_\_\_ date \_\_\_\_\_

Scott Owen  
Supervising AQ Engineer

## APPENDIX K

### ENGINEERING EVALUATION APPLICATION 24291

**Engineering Evaluation Report  
USS-POSCO Industries  
Plant #2371; Application #24291**

**I. Background:**

**USS-POSCO has applied to obtain an Authority to Construct and Permit to Operate the following equipment:**

- **S- 402: Horizontal Electrostatic Coil Oiler**

**The equipment is designed to apply a uniform coating of oil to steel coils for rust protection. The oil is deposited on the pickled steel coils by electrostatic deposition. USS-POSCO is a Title V facility. The facility has also filed a Title V modification application (application number 24556). The modification permit will be completed after this permit is issued.**

**Similar equipment was permitted under Application number 18919 for source S-292 governed by condition number 16682. S-292 has an exhaust fan that exhausts the oil mist and vapors from the oiler through an electrostatic precipitator. The precipitator traps the airborne oil particles. Source tests are conducted annually at S-292 to determine the VOC emission. The average VOC emission at the outlet of the precipitator is 0.021 pound per gallon of oil used.**

**Source S-402 is a more advanced completely covered box without any exhaust ports. Excess uncoated oil is collected in the sump at the bottom of the oiler and is reused. Thus an electrostatic precipitator is not required and there will be no oil mist or VOC emission from the equipment. S-402 uses the same Steel Shield 6299 oil as used at source S-292. The coated coils are stored in the warehouse for one to two week period prior to shipping to the customer. Thus VOC emissions are expected to occur in the warehouse before shipment. Since it was difficult to estimate the actual VOC emissions from the oil coated coils during storage, the District requested USS-POSCO to conduct a laboratory controlled test to estimate the VOC emission during storage. The lab analysis was done by an independent lab and the results are attached. The analysis was performed by exposing the oil to 110°F temperature and measuring the VOC emission. The lab analysis demonstrated that the VOC emission from the coating oil was below the detection level. As a conservative estimate of VOC emission from S-402 during storage, S-292 source test emission rate of 0.021 lb/gallon is used as the emission factor.**

***II. Emission Calculations:***

**II a. Based on S-292 source test developed emission factor of 0.021 lb VOC/gallon of oil coated:**

$$\text{S-402 VOC emission} = 0.021 \text{ lb/gal} \times 100 \text{ gal/day} = \underline{\underline{2.1 \text{ lb/day or } 766.5 \text{ lb/y}}}$$

**or 0.383 t/y**

To allow flexibility of oil usage the applicant will be allowed to emit 0.383 t/y of NPOC



**II b. Cumulative Increase:** Table 1 presents the Plant Cumulative emissions.

**Table 1: Plant Cumulative Increase**

Pollutant	New Emission (t/y)	Existing Cumulative Increase for the Plant (t/y)	Cumulative Emissions (t/y)	Comments
PM10	0	15.583	15.583	
NOx	0	0	0	Offset
CO	0	26.171	26.171	
SO <sub>2</sub>	0	3.562	3.562	
POC	0.383	0	0.383	Offset from the plant Bank #1282 required
NPOC	0	0	0.383	0.383

**III Statement of Compliance:**

**III a. Regulation 8-11 - Metal Container, Closure and Coil Coating**

The VOC content of the coil coating oil is 103 g/l and therefore complies with Regulation 8-11-303 and 8-11-304.

**III b. Regulation 2-1 - General Requirements**

The project is not located within 1000 feet of the nearest school and therefore not subject to the public notification requirements of Regulation 2-1-412.

**III c. Regulation 2-2 – New Source Review**

**III c.1 Regulation 2-2-301- BACT**

Sources trigger BACT when NOx, CO, SO<sub>2</sub>, POC, NPOC or PM<sub>10</sub> emissions exceed or have the potential to exceed 10 pounds per highest day. S-402 POC emissions are less than 10 pounds per day and thus BACT is not triggered.

**III c.2 Regulation 2-2-302 - Offset Requirements**

USS-POSCO is a major facility. They are required to provide offsets for 0.383 ton per year POC emission from S-402 since the facility PTE is over 35 tons per year.

USS-POSCO has 0.97 tons of POC in the bank under Certificate Number 1282. The applicant has authorized offsetting the 0.383 tons of POC emission from

their

Banking Certificate Number 1282.

**IIIc.3 Regulation 2-2-304 – PSD**

USS-POSCO is not subject to PSD for this application.

**III d. Regulation 2-5 - NSR of Toxic Air Contaminants**

Steel Shield 6299 (MSDS attached) coating oil used at Source S-402 does not contain any Toxic Air Contaminants (TAC). Thus Regulation 2-5 does not apply.

**III e. Regulation 3 – Fees**

USS-POSCO has prepaid the fee for a Title V modification and for the new NSR permit. Thus portion of this money will be applied towards this permit application and the rest will be applied towards the Title V modification permit fee.

**III f. Regulation 2-1-311 - CEQA**

The project is considered to be ministerial under the District CEQA Regulation 2-1-311 because it is evaluated in accordance with Chapter 5.5 of the Permit Handbook and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors and therefore is not discretionary as defined by CEQA.

**III g. Regulation 2-6 - Major Facility Review**

**USS-POSCO is a Title V facility. Since the equipment covered under this application is a new source, a modification to the Title V permit is required. The Title V modification will be completed after the permit is issued for S-402.**

**III h. 40 CFR Part 60, Subpart TT: Standards of Performance for Metal Coil Surface Coating:**

VOC content in the coating oil used at S-402 is 103 grams per liter. Subpart TT specifies 140 grams or less of VOC per liter of coating oil as a complying coating. Further, Subpart TT applies to a coating operation that includes a curing oven and a quench station. The background document EPA-450/3-80-30a applies to dried and cured coatings. At Source S-402 the oil coating is neither cured nor quenched. Thus S-402 complies with all the requirements of 40 CFR Part 60, Subpart TT-Standards of Performance for Metal Coil Surface Coating.

**IV Conditions:**

**USS-POSCO Industries**

**Plant #2371; Application #24291**

**Condition Number 25272**

The condition applies to the following source.

**• S- 402: Horizontal Electrostatic Coil Oiler**

1. The owner/operator of S-402 shall not exceed 36,500 gallons of Steel Shield 6299 coating oil in any consecutive 12 month period. (Basis: Cumulative Increase)
2. The owner/operator of S-402 may use coatings other than the material specified in part 1, and/or usages in excess of those specified in part, provided that they can demonstrate that all of the following are satisfied:
  - a. Total POC emissions do not exceed 0.383 tons in any consecutive twelve month period; and
  - b. Total NPOC emissions do not exceed 0.383 tons in any consecutive twelve month period; and
  - c. The use of these materials do not increase toxic emissions above any risk screening trigger levels.

(Basis: Cumulative Increase, Emission Offsets, Toxic Risk Screen)

3. The owner/operator of S-402, to determine compliance with parts 1 and 2, shall maintain the following records and provide all of the data necessary to evaluate compliance with the above parts. Records include the following information:
  - a. Type and monthly usage of all POC containing materials used
  - b. Type and monthly usage of all NPOC containing materials used
  - c. If a material other than those specified in part 1 is used, POC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with part 2, on a monthly basis;
  - d. Monthly usage and/or emission calculations shall be totaled for each consecutive twelve-month period.

All records shall be retained on-site for five years, from the date of entry, and made available for inspection by District staff upon request. These recordkeeping requirements shall not replace the recordkeeping requirements contained in any applicable District Regulations. (Basis: Cumulative Increase, Emission Offsets, Toxic Risk Screen)

**Recommendation:**

I recommend that a Permit to Operate be issued to the following source S-402 subject to condition # 25272

- **S- 402 Horizontal Electrostatic Coil Oiler**

Hari S Doss, PE



June 04, 2012

APPENDIX L  
BAAQMD COMPLIANCE REPORT

**COMPLIANCE & ENFORCEMENT DIVISION**

**Inter-Office Memorandum**

**September 6, 2012**

TO: JIM KARAS – DIRECTOR OF ENGINEERING   
FROM: RICHARD LEW – ACTING DIRECTOR OF COMPLIANCE & ENFORCEMENT   
SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

**USS-POSCO INDUSTRIES; SITE #A2371**

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**Background**

This review was initiated as part of the District evaluation of an application by USS-POSCO INDUSTRIES for a Title V Permit Renewal. It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of a renewal of a Title V Permit. The purpose of this review is to ensure that any non-compliance problems identified during the prior five-year permit term have been adequately addressed, or, if non-compliance persists, that a schedule of compliance is properly incorporated into the Title V permit. In addition, the review checks for patterns of recurring violation that may be addressed by additional permit terms. Finally, the review is intended to recommend, if necessary, any additional permit conditions and limitations to improve compliance.

USS-POSCO steel finishing plant in Pittsburg, CA is owned and operated by USS-POSCO Industries (UPI), a joint venture company established by U.S. Steel (now called USX Corporation) and Pohang Iron and Steel Company, Ltd. of the Republic of Korea. UPI manufactures cold rolled, galvanized and tin mill products from hot rolled steel. Continuous Emission Monitors are in place to measure applicable pollutants.

**Compliance Review**

**1. Violation History**

Staff reviewed UPI Annual Compliance Certifications and found no ongoing non-compliance and no recurring pattern of violations. During this period UPI received 4 notice of violations (NOV) for six infractions. The majority of NOVs were multi day occurrences and compliance has been achieved, as described below.

COMPLIANCE REVIEW OF  
**USS-POSCO INDUSTRIES, SITE #A2371**  
Date: September 6, 2012  
Page 2 of 2

NOV#	Regulation	Date Occur	# of Days	Comments	Disposition
A45024A	8-45-308	5/26/05	7	Open spent rags/paint cont.	Resolved
A45024B	8-45-316	5/26/05	7	Spraying without filtration	Resolved
A46824A	2-6-307	7/18/06	4	Failure to meet permit cond.	Resolved
A46824B	1-522.7	7/18/06	21	Late reporting	Resolved
A46821A	2-6-307	10/24/06	1	Failed source test	Resolved
A49175A	2-6-307	10/3/09	0	Failed source test	Cancelled

## 2. Complaint History

The District received six air pollution complaints alleging UPI as the source. Six complaints alleged odors from the facility, the other two were for painting and mechanical issues. All complaints were investigated by District staff and were not confirmed.

## 3. Reportable Compliance Activity

Reportable Compliance Activity (RCA), also known as "Episode" reporting, is the reporting of compliance activities involving a facility as outlined in District Regulations and State Law. Reporting covers breakdown requests, indicated monitor excesses, pressure relief device releases, inoperative monitor reports and flare monitoring.

During the period the District received **25** notifications for RCA's. Of those 25 RCA's, 23 resulted in the issuance of **1** NOV, NOV #A46824, for NOx related emissions due to SCR abatement inefficiencies. Issues with SCR abatement have since been resolved.

## 4. Enforcement Agreements, Variances, or Abatement Orders

There were no enforcement agreements, variances, or abatement orders for UPI during the period.

## Conclusion

Following its review of all available facility and District compliance records from the date of issuance of USS-POSCO INDUSTRIES's last Title V permit renewal until the present (6/17/04 to 9/6/12), the District's Compliance and Enforcement Division has determined that the facility was in compliance. UPI has demonstrated no evidence of ongoing non-compliance and no recurring pattern of violations that would warrant consideration of a Title V permit compliance schedule for this facility.

Based on this review, the District has concluded that no schedule of compliance or change in permit terms is necessary beyond what is already contained in the facility's current Title V permit.

RJS 9/6/12

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