MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

December 3, 2015

PERMIT TO INSTALL
98-15

ISSUED TO
United States Steel Corporation

LOCATED AT
1 Quality Drive
Ecorse, Michigan

IN THE COUNTY OF
Wayne

STATE REGISTRATION NUMBER
A7809

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environmental Quality. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: **May 11, 2015**	
DATE PERMIT TO INSTALL APPROVED: **December 3, 2015**	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

PERMIT TO INSTALL

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Common Abbreviations / Acronyms

Common Acronyms		Pollutant / Measurement Abbreviations	
AQD	Air Quality Division	BTU	British Thermal Unit
BACT	Best Available Control Technology	°C	Degrees Celsius
CAA	Clean Air Act	CO	Carbon Monoxide
CEM	Continuous Emission Monitoring	dscf	Dry standard cubic foot
CFR	Code of Federal Regulations	dscm	Dry standard cubic meter
CO_2e	Carbon Dioxide Equivalent	°F	Degrees Fahrenheit
COM	Continuous Opacity Monitoring	gr	Grains
EPA	Environmental Protection Agency	Hg	Mercury
EU	Emission Unit	hr	Hour
FG	Flexible Group	H_2S	Hydrogen Sulfide
GACS	Gallon of Applied Coating Solids	hp	Horsepower
GC	General Condition	lb	Pound
GHGs	Greenhouse Gases	kW	Kilowatt
HAP	Hazardous Air Pollutant	m	Meter
HVLP	High Volume Low Pressure *	mg	Milligram
ID	Identification	mm	Millimeter
LAER	Lowest Achievable Emission Rate	MM	Million
MACT	Maximum Achievable Control Technology	MW	Megawatts
MAERS	Michigan Air Emissions Reporting System	ng	Nanogram
MAP	Malfunction Abatement Plan	NO_x	Oxides of Nitrogen
MDEQ	Michigan Department of Environmental Quality (Department)	PM	Particulate Matter
MSDS	Material Safety Data Sheet	PM10	PM with aerodynamic diameter ≤10 microns
NESHAP	National Emission Standard for Hazardous Air Pollutants	PM2.5	PM with aerodynamic diameter ≤ 2.5 microns
NSPS	New Source Performance Standards	pph	Pounds per hour
NSR	New Source Review	ppm	Parts per million
PS	Performance Specification	ppmv	Parts per million by volume
PSD	Prevention of Significant Deterioration	ppmw	Parts per million by weight
PTE	Permanent Total Enclosure	psia	Pounds per square inch absolute
PTI	Permit to Install	psig	Pounds per square inch gauge
RACT	Reasonably Available Control Technology	scf	Standard cubic feet
ROP	Renewable Operating Permit	sec	Seconds
SC	Special Condition	SO_2	Sulfur Dioxide
SCR	Selective Catalytic Reduction	THC	Total Hydrocarbons
SRN	State Registration Number	tpy	Tons per year
TAC	Toxic Air Contaminant	µg	Microgram
TEQ	Toxicity Equivalence Quotient	VOC	Volatile Organic Compound
VE	Visible Emissions	yr	Year

* For High Volume Low Pressure (HVLP) applicators, the pressure measured at the HVLP gun air cap shall not exceed ten (10) pounds per square inch gauge (psig).

GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**

2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environmental Quality, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**

3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to R 336.1210, operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**

4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**

5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to R 336.1219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of R 336.1219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality. **(R 336.1219)**

6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**

7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**

8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.

9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of R 336.1301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with R 336.1303. **(R 336.1301)**
    a. A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
    b. A visible emission limit specified by an applicable federal new source performance standard.
    c. A visible emission limit specified as a condition of this Permit to Install.

12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in R 336.1370(2). **(R 336.1370)**

13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. **(R 336.2001)**

SPECIAL CONDITIONS

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Process Equipment & Control Devices)	Installation Date / Modification Date	Flexible Group ID
EUCON-GALV-LINE-S1	Continuous galvanizing operations including: 1. Continuous galvanizing line 2. Continuous galvanizing line annealing furnace 3. Continuous galvanizing line selective catalytic reduction unit with exhaust gas NO_x and Oxygen analyzers 4. Burner to heat exhaust if needed before entering the selective catalytic reduction unit 5. Continuous galvanizing line oiler 6. Continuous galvanizing line pre-cleaner mist scrubber 7. Phosphorus and Chromate coating section	6-1-1998/ 8-16-2006/ 12-3-2015	NA
Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1290.			

The following conditions apply to: EUCON-GALV-LINE-S1

DESCRIPTION:

Continuous galvanizing operations including:
1. Continuous galvanizing line
2. Continuous galvanizing line annealing furnace
3. Continuous galvanizing line selective catalytic reduction unit with exhaust gas NO_x and Oxygen analyzers
4. Burner to heat exhaust if needed before entering the selective catalytic reduction unit
5. Continuous galvanizing line oiler
6. Continuous galvanizing line pre-cleaner mist scrubber
7. Phosphorus and Chromate coating section

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT:

Pre-cleaner mist scrubber and Selective Catalytic Reduction Unit.

I. EMISSION LIMITS

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Total combined nitrogen oxide emissions as nitrogen dioxide (NO_x)	7.24 pounds per hour*	Per hour	EUCON-GALV-LINE-S1 Annealing Furnace, including the burner and the edge burners of the hot dip galvanizing line in the G-Building	SC V.1, SC VI.1, SC VI.2, SC VI.3	**R336.1205**
2. Total combined nitrogen oxide emissions as nitrogen dioxide (NO_x)	27.51 tons per year*	Based on a 12-month rolling time period as determined at the end of each calendar month	EUCON-GALV-LINE-S1 Annealing Furnace and the edge burners of the hot dip galvanizing line in the G-Building	SC V.1, SC VI.1, SC VI.2, SC VI.3	**R336.1205**
3. Total combined nitrogen oxide emissions as nitrogen dioxide (NO_x)	6.6 pounds per hour*	As determined by the average of three one-hour time periods by testing or otherwise determined by the testing protocol agreed upon by AQD	EUCON-GALV-LINE-S1 Annealing Furnace controlled by a Selective Catalytic Reduction (SCR) unit	SC V.1, SC VI.1, SC VI.2, SC VI.3	**R336.1205**
4. Total combined nitrogen oxide emissions as nitrogen dioxide (NO_x)	25 tons per year*	Based on a 12-month rolling time period as determine at the end of each calendar month	EUCON-GALV-LINE-S1 Annealing Furnace controlled by a Selective Catalytic Reduction (SCR) unit	SC V.1, SC VI.1, SC VI.2, SC VI.3	**R336.1205**
5. Particulate Matter	0.26 pounds per hour[2]	As determined through reference test method 5	EUCON-GALV-LINE-S1 Electrolytic cleaning process equipment controlled by a cross flow packed bed scrubber system	SC V.2	**R336.1205, R336.1331**
6. VOC	28.91 tons per year[2]	Based on a 12-month rolling time period as determined at the end of each calendar month	EUCON-GALV-LINE-S1 Rust preventive oil application electrostatic spray unit operation	SC VI.1	**R336.1205, R336.1702**

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
7. VOC	0.44 pound per gallon of oil[2]	Per Method 24 or other AQD approved method	EUCON-GALV-LINE-S1 Rust preventive oil application electrostatic spray unit operation	GC 13	**R336.1205, R336.1702**
8. Ammonia	1.44 pounds per hour[2]	As determined by the average of three one-hour time periods by testing or otherwise determined by the testing protocol agreed upon by AQD	EUCON-GALV-LINE-S1 Annealing furnace controlled by SCR unit	SC V.1	**R336.1224, R336.1225**
9. Phosphoric Acid	4.4 pounds per hour	24-hour average	EUCON-GALV-LINE-S1 Phosphorus and Chromate Coating operation	SC VI.19	**R336.1224, R336.1225**
*Subject to Consent Order No. 33-2015					

II. MATERIAL LIMITS

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Galvanized Steel	850,000 tons processed per year[2]	Based on a 12-month rolling time period as determined at the end of each calendar month	EUCON-GALV-LINE-S1	VI.7	**R336.1205**
2. Natural Gas	838.6 million cubic feet per year[2]	Based on a 12-month rolling time period as determined at the end of each calendar month	EUCON-GALV-LINE-S1 Annealing Furnace, including the burner, and Edge Burners	VI.12	**R336.1205**
3. Phosphoric Acid	105.6 pounds per day	24-hour average	EUCON-GALV-LINE-S1 Phosphorus and Chromate Coating operation	SC VI.19	**R336.1224, R336.1225**

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall not operate the continuous galvanizing line, EUCON-GALV-LINE-S1, unless an Operation and Maintenance Plan (OMP) as described in Rule 911(2) has been submitted to the AQD District Supervisor. The permittee shall submit an updated OMP including the burner no later June 29, 2016, or 210 days after the issuance of Permit to Install 219-06B, whichever is later. The OMP shall include monthly inspections of all systems associated with the urea feed system, describe preventative maintenance consistent with the manufacturer's recommendations, and include a requirement for periodic determination of the functional viability of the catalyst. The OMP shall also include a requirement to repair any defect that could reasonably be expected to result in non-compliance identified during any inspection within a reasonable time period. **(R 336.1911, R 336.1912, R 336.2802, AQD CO 1-2005, Paragraph B.3)**

2. The permittee shall not operate the continuous galvanizing line, EUCON-GALV-LINE-S1, unless a Malfunction Abatement Plan (MAP) as described in Rule 911(2) has been submitted to the AQD District Supervisor. The permittee shall submit an updated MAP including the burner no later than June 29, 2016, or 210 days after the issuance of Permit to Install 219-06B, whichever is later. The MAP shall include the annealing furnace controlled by the SCR unit, the burner, and the electrolytic cleaning equipment controlled by a packed bed scrubber. It shall address alarm conditions that indicate abnormal functioning of the system including the operating parameter values and associated averaging time that would trigger the alarm. **(R 336.1911, R 336.1912, R 336.2802, AQD CO 1-2005, Paragraph B.3)**

3. The permittee shall submit the OMP and MAP and any amendments to the OMP or MAP to the AQD District Supervisor for review and approval. If the AQD does not notify the permittee within 90 days of submittal, the OMP, MAP, amended OMP or amended MAP shall be considered approved. Until an amended plan is approved, the permittee shall implement corrective procedures or operational changes to achieve compliance with all applicable emission limits. If at any time the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the permittee shall amend the MAP within 45 days after such an event occurs. The permittee shall also amend the OMP/MAP within 45 days, if new equipment is installed. The permittee shall review the OMP/MAP upon request from the District Supervisor. **(R 336.1911, R 336.1912, R 336.2802, AQD CO 1-2005, Paragraph B.3)**

IV. DESIGN/EQUIPMENT PARAMETERS

1. The SCR unit shall be equipped with an automatic urea feed injection system controlled by an automatic control system based on feedback and feed forward controls. This automatic control system shall be equipped with an alarm that will indicate any abnormal functioning of the system as described in the MAP[2]. **(R336.1205, R 336.1910)**

2. The permittee shall not operate the electrolytic cleaning process equipment unless the cross flow packed bed scrubber is installed and operating properly. A minimum water flow rate of gallons per minute or other rate established during compliance testing shall be maintained. The permittee shall install a flow gauge to measure the water flow rate[2]. **(R336.1205, R336.1331, R 336.1910)**

3. NO_x and Oxygen concentrations in the exhaust gases from the annealing furnace controlled by the SCR unit shall be monitored using NO_x and Oxygen analyzers and the automatic calibration equipment shall be programmed pursuant to the manufacturer's specifications on a time frame acceptable to the AQD District Supervisor[2]. **(R 336.1205, R 336.1910)**

4. Effective April 30, 2016, or 150 days after the issuance of Permit to Install 219-06B, whichever is later, the permittee shall not operate the galvanizing line unless the SCR unit and associated burner are installed and operating properly. Proper operation includes, but is not limited to, maintaining a minimum catalyst bed inlet temperature of 475 degrees Fahrenheit during production mode of operation. The unit shall be considered in production mode if the main burners are firing and the product is moving through the continuous annealing furnace.[2] **(R 336.1910)**

5. Effective 150 days after the issuance of Permit to Install 219-06B, the permittee shall not operate the galvanizing line unless the SCR alarms monitoring the catalyst bed inlet temperature and urea injection rate are installed, maintained, and operating properly as specified in the OMP and MAP. The unit shall be considered in production mode if the main burners are firing and the product is moving through the continuous annealing furnace[2] **(R 336.1910)**

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall conduct a nitrogen oxides and ammonia emission test from the annealing furnace/SCR unit during operation once every five years or more frequently upon the request of AQD. Nitrogen oxides emission testing shall be performed using Reference Method 7E or other approved method and ammonia emission testing shall be performed using an approved method. No less than 30 days prior to testing, a complete stack test protocol must be submitted to AQD for approval. The final plan must be approved by the AQD prior to testing. **(R 336.1205, R 336.2001, R 336.2003, R 336.2004)**

2. The permittee shall conduct a particulate matter emission test from the cross flow packed scrubber stack during operation once every five years or more frequently upon the request of AQD. Particulate emission testing shall be performed using Reference Method 17 or other approved method. No less than 30 days prior to testing, a complete stack test protocol must be submitted to AQD for approval. The final plan must be approved by the AQD prior to testing. **(R 336.1205, R 336.2001, R 336.2003, R 336.2004)**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall monitor NO_x and Oxygen concentrations in the exhaust gases from the annealing furnace controlled by the SCR unit using the NO_x and Oxygen analyzers. The permittee shall continuously monitor outlet NOx concentration and record the concentration once per shift as an indicator of proper operation of the Selective Catalytic Reduction (SCR) during production mode of operation. The unit shall be considered in production mode if the main burners are firing and the product is moving through the continuous annealing furnace. **(40 CFR 64.6(c)(1)(i and ii), R 336.1205)**

2. The permittee shall continuously monitor the urea injection rate and record at least once per shift as an indicator of proper operation of the SCR during production mode of operation. In the event the urea injection rate alarm is triggered, corrective action must be initiated to determine the cause of the alarm within 1 hour of the alarm. The unit shall be considered in production mode if the main burners are firing and the product is moving through the continuous annealing furnace. **(R 336.1910, 40 CFR 64.6(c)(1)(i and ii))**

3. The permittee shall continuously monitor catalyst bed inlet temperature and record the inlet temperature at least once per shift as an indicator of proper operation of the SCR. In the event the catalyst bed inlet temperature alarm is triggered, corrective action must be initiated to determine the cause of the alarm within 1 hour of the alarm. **(R 336.1910, 40 CFR 64.6(c)(1)(i and ii))**

4. An excursion is a departure from the indicator range defined in the MAP and/or OMP. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of EUCON-GALV-LINE-S1 (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). **(40 CFR 64.6(c)(2)), 40 CFR 64.7(d))**

5. The permittee shall conduct a cylinder gas audit on the NO_x and Oxygen analyzers once each calendar quarter to assess the accuracy of the data collected by the monitors using a method acceptable to the AQD District Supervisor. **(R 336.1910)**

6. The permittee shall record each occurrence of abnormal functions by the automatic control system of the automatic urea feed injection system of the SCR as defined in the MAP and make the records available to AQD upon request[2]. **(R 336.1910)**

7. The permittee shall keep records of the total amount of galvanized steel processed per month and rolling 12-month time period as determined at the end of each calendar month. These records shall be made available to AQD upon request. [2]. **(R 336.1201(3),**

8. The permittee shall keep records of the total amount of urea usage per day and make the records available to AQD upon request[2]. **(R336.1205, R 336.1910)**

9. The permittee shall keep records of the water flow rate reading in the cross flow packed bed scrubber daily and make the records available to AQD upon request. Permittee shall take appropriate corrective action if flow rate is below minimum of 30 gallons per minute or other flow established during stack testing and shall keep records of corrective action taken[2]. **(R336.1205, R 336.1910)**

10. The permittee shall keep records of the calibration and maintenance activities conducted on the automatic calibration equipment for the NO_x and Oxygen Analyzers and make the records available to AQD upon request[2]. **(R336.1205, R 336.1910, 40 CFR 64.7)**

11. The applicant shall keep a record of the following concerning the use of the rust preventive oil application electrostatic spray unit of the hot dip galvanizing line:
    a. The amount applied in gallons on a monthly and 12 month rolling basis as determined at the end of each calendar month.
    b. The VOC content of each oil applied.
    c. VOC emission calculations determining the total mass emissions on a monthly and 12 month rolling basis as determined at the end of each calendar month. [2] **(R 336.1205)**

12. The permittee shall monitor and record the total and separate monthly natural gas usage for both the edge burners and the annealing furnace including the burner in a manner and with instrumentation acceptable to the AQD District Supervisor. Acceptable instrumentation and manner of recording are natural gas meters and total natural gas usage summary every end of the month recorded by the permittee. The permittee shall keep records of the total natural gas usage for the annealing furnace and edge burners based on the 12-month rolling time period as determined at the end of each calendar month and make the records available to AQD upon request[2]. **(R 336.1205)**

13. The permittee shall keep records of monthly and 12 month rolling NO_x emissions calculations at the end of each calendar month for the annealing furnace and edge burners and make the records available to AQD upon request[2]. **(R 336.1205)**

14. The permittee shall maintain records as necessary to demonstrate compliance with the Operation and Maintenance Plan (OMP) including, but not limited to, records of inspections, maintenance and repair for the SCR system. **(R 336.1205)**

15. The permittee shall properly maintain the monitoring system including maintaining necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**

16. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 64.7(c))**

17. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan and any activities undertaken to implement a quality improvement plan, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

18. The permittee shall obtain the material safety data sheets (MSDS) for all coatings and cleaners used in EUCON-GALV-LINE-S1. The permittee shall maintain a copy of all versions of MSDS for each material utilized on-site with corresponding dates of material content changes on file and make them available to AQD upon request. **(R 336.1205(3)**

19. The permittee shall keep the following information on a daily basis for EUCON-GALV-LINE-S1
    a. Gallons of each liquid material used containing phosphoric acid.
    b. Phosphoric Acid content of each material on a pound per gallon basis
    d. Calculation of the total pounds of phosphoric acid used per day
    e. Phosphoric Acid emission calculations determining the average hourly emission rate in pounds per hour based on daily use

    The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1224, R 336.1225)**

20. The permittee shall maintain records of the date and time each time the urea injection or catalyst bed temperature alarm was triggered, date and time the corrective action was initiated, the corrective action taken, and the time and date when corrective actions were completed in response to an alarm. Records shall also contain the operating parameter and value that triggered the alarm and the value at the time the corrective action is completed[2]. **(R336.1205, R 336.1910)**

VII. REPORTING

1. Each semiannual report of monitoring deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**

VIII. STACK/VENT RESTRICTIONS

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVCONGALVSCRBR	24[2]	135[2]	**40 CFR 52.21(c) & (d)**
2. SVCONGALVFNCE	60[2]	130[2]	**40 CFR 52.21(c) & (d)**
3. SVCONGALVCOAT	44[2]	130[2]	**R336.1224, R336.1225**

IX. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

2. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

Footnotes:
[1]This condition is state only enforceable and was established pursuant to Rule 201(1)(b).
[2]This condition is federally enforceable and was established pursuant to Rule 201(1)(a).