

B3472  
MAWILL

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection**

B347239069

FACILITY: VOSS INDUSTRIES-VOSS TAYLOR DIV		SRN / ID: B3472
LOCATION: 7925 BEECH DALY, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Steve Fischer , Director of Operations		ACTIVITY DATE: 02/14/2017
STAFF: Todd Zynda	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: February 14, 2017 Inspection		
RESOLVED COMPLAINTS:		

**PURPOSE OF INSPECTION:** Targeted

**INSPECTED BY:** Todd Zynda (AQD), Jerry Krawiec (AQD)

**PERSONNEL PRESENT:** Steve Fischer, Director of Operations; Mike Ratusznik, Director of Accounting; Rob Squiers, General Counsel

**FACILITY PHONE NUMBER:** (313) 429-5030

**FACILITY WEBSITE:** [www.vossindustries.com](http://www.vossindustries.com)

### FACILITY BACKGROUND

PGP Corporation d/b/a Voss Industries - Voss Taylor (Voss) began operation in 1968 as a processor of flat rolled steel, providing its customers with a variety of services including hydrochloric pickling, special oils, slitting, and corrective leveling. Voss operates 7 days per week, 24 hours a day. The facility has the annual capacity to pickle 720,000 tons and a slitting capacity of 300,000 tons. Equipment is housed in a 400,000 square foot facility on 21 acres of land located in Taylor, Michigan. The company serves the automotive, steel distribution, tubing and appliance industries. The facility currently has approximately 105 employees.

### COMPLAINT/COMPLIANCE HISTORY

There have not been any complaints regarding this facility since August 12, 2008.

During an inspection of 2015, the facility was determined to be in compliance with applicable Federal and State air quality regulations.

### OUTSTANDING CONSENT ORDERS

None

### OUTSTANDING VNs

None

### INSPECTION NARRATIVE

On February 14, 2017 the MDEQ Air Quality Division (AQD) inspectors Mr. Todd Zynda and Mr. Jerry Krawiec, conducted an unannounced inspection of Voss located at 7925 Beech Daly, Taylor, Michigan. During the inspection Mr. Steve Fischer, Director of Operations, Mike Ratusznik, Director of Accounting, and Rob Squiers, General Counsel, provided information and tour of facility operations.

The inspection was conducted to determine the facility's compliance with the Natural Resources and Environmental Protection Act (NREPA), Act 451, Part 55, and Wayne County Department of Health Permits #75, C-3516, and C-4501. Voss operates 1-HCl pickling line, 2 – natural gas boilers, 1-cold cleaner, 1- slitting line, a fresh acid and waste acid tank farm, 1- wastewater treatment system, and 1- 375 kilowatts (KW) diesel fueled emergency engine. During the inspection, no visible emissions were observed.

During the opening meeting a site layout was provided and facility operations were discussed. The facility was provided with a copy of 40 CFR Part 63, Subpart CCC – National Emission Standards for Hazardous Air Pollutants for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants. A lengthy discussion was held regarding the facility potential to emit (PTE) and the Title V program. The facility agreed to

provide PTE calculations as part of the records submittal. HCl regeneration does not occur at the facility. Fresh acid is brought onsite, used in the pickling process, and waste acid is hauled offsite for regeneration or disposal.

Following the opening meeting, an inspection of the facility was conducted. The inspection began with observation of the HCl pickling line. The purpose of the pickling process is to remove oxide scale that forms on the surface of the steel during hot rolling. Dilute HCl is used to remove the oxide scale. The pickling line consists of a number of acid tanks and a water spray rinse tank connected in series. The tanks are enclosed and are vented under negative pressure through the existing scrubbers.

Steel strip is uncoiled, stitched together and continuously pulled at a predetermined speed through the pickling line. As steel strip proceeds through the line, it passes through a series of acid tanks (tanks #1 through #4) where it is immersed in dilute acid solution (approximately 6 to 8% HCl by volume) at approximately 180° F. According to the records submittal the total capacity of the pickle tanks and pickle tank reservoirs is 36,000 gallons. HCl is consumed through the pickling process (conversion to ferrous chloride) and through evaporation that is captured by the scrubbers. Fresh acid is added to tank #3, along with a portion of the scrubber discharge water. The content of pickling tank #3 cascades back to tank #1 (the entry point of the steel). The acid concentration is monitored using a conductivity meter. An algorithm determines the amount of fresh acid needed to maintain the target HCl range for pickling. Following the acid tanks, the strip is passed through a spray rinse tank. A rust inhibitor (soap or oil based coating – SDS were provided) is applied and the strip is recoiled. During the inspection, the ventilation to the scrubbers was observed.

Prior to the steel strips entering the pickling tanks, the steel is slightly stretched removing any loose scale. Loose scale is vented to a cartridge type pulse jet bag house ("dust hog"). The dust collector vents horizontally on the north side of the building. According to Mr. Fischer an alarm sounds at 1.8 inches water. During the inspection the gauge on the dust collector read 0.5 inches water.

Following observation of the pickling line, the fresh acid and waste acid tank farm was observed. The tanks are located either inside the facility, or in a semi-enclosed portion of the building. During the inspection it was observed that the tanks are vented to the scrubber. According to Mr. Fischer, the facility receives a couple of tanker trucks of acid per day (approximately 1,500 gallons acid per truck). A similar amount of waste acid is hauled offsite daily. Fresh acid is received at approximately a 36% concentration. According to correspondence from Mr. Squiers, dated March 16, 2017, two of the fresh acids tanks were installed in late 1997, and one tank (rubber lined) was installed sometime prior to 1989.

Following observation of the tank farm, the scrubber was observed. Emissions are controlled by two packed bed scrubbers in series (Heil and Raven). According to the Pickle Line Scrubber HCl Emissions Test Report dated November 30, 2007, "each packed bed scrubber is 84 inches in diameter. The first scrubber (Heil) has a packing depth of 96 inches while the second (Raven) has a packing depth of 60 inches. The second scrubber is equipped with a demister pad which is continually wet off the recirculation pump line. The process is equipped with two fans, one in use and the other on standby. The flue gas is ducted to an exhaust stack measuring 36 inches in diameter and 125 inches in length." According to correspondence from Mr. Squiers dated March 16, 2017, the scrubber discharge water averages 14 gpm. Approximately 6.5 gpm of the discharge is directed to pickling tank 3 and eventually becomes part of the spent pickle liquor that is hauled offsite. Approximately 7.5 gpm of the scrubber discharge goes the facility's wastewater treatment system.

According to records provided, HCl %, temperature, and water flow rate (gpm) are monitored daily (approximately once a shift) for both scrubbers. Pressure drop is monitored on the first scrubber (Heil) and recorded daily (approximately once a shift).

Following observation of the scrubber, two natural gas boilers were observed. Both boilers operate solely on natural gas and provide process steam. Boiler specifications recorded during the inspection are listed below.

Boiler 1 – 500 HP; 21,000 cfm (approximately 22,050,000 Btu/hr); dated 1974

Boiler 2 – 250 HP; 8,369,000 Btu/hr; dated 1992

Following observation of the boilers, the slitting area was observed. Any emission generated in slitting steel is released to the general in-plant environment. The slitting area also contains one cold cleaner. The dimensions of the cold cleaner are approximately 2.5 feet by 3 feet (7.5 square feet). The SDS for the cold cleaner was

provided in the records submittal. During the inspection, the cold cleaner lid was open. A "DEQ Cold Cleaner Operating Procedures" sticker was provided to Mr. Fischer as operating instructions were not posted.

Following observation of the slitting area, the facility emergency generator was observed. The 365 KW diesel emergency generator is believed to have been installed in early 1990. Records provided indicate the engine was constructed on August 31, 1989.

The facility also operates a wastewater treatment system used to treat the wash water from the pickle line. According to Mr. Squiers the wastewater treatment system does not treat volatile organic compounds.

A second building located to the south of the main production building was also observed. The second building is used for overflow storage of steel coils.

## APPLICABLE RULES/PERMIT CONDITIONS

### Wayne County Department of Health Permits

#### Permit #75 – April 10, 1968 - HCl Line

The permit does not contain any special conditions.

#### C-3516 – February 2, 1975 – Fume Scrubber

The permit does not contain any special conditions.

#### C-4501 – November 16, 1977 – Fume Scrubber Entrainment Separator

The permit does not contain any special conditions.

## FACILITY POTENTIAL TO EMIT

The facility PTE was evaluated as part of this inspection. According to Mr. Squiers, the facility has capability to pickle approximately 120 tons of steel per hour (see attached email correspondence). The facility PTE was evaluated using the six different methods described below.

### 1. USEPA Webfire Emission Factor

Using the emission factor for pickling obtained from the USEPA emission factors located on the WebFire internet, the uncontrolled HCl emissions were calculated.

120 tons per hour x 8760 hours per year x 5.500E-4 lb per ton material produced = 578.16 lb per year or **0.28 tons per year**.

It should be noted that AP-42 Formula Notes indicate the following "Calculated from information in reference. Lack of supporting documentation". The quality of this emission factor is "U", defined as the following "U = Unrated (Only used in the EPA's Locating and Estimating (L&E) documents). Emission factor is developed from source tests which have not been thoroughly evaluated, research papers, modeling data, or other sources that may lack supporting documentation. The data are not necessarily "poor," but there is not enough information to rate the factors according to the rating protocol. "U" ratings are commonly found in L&E documents and FIRE rather than in AP 42."

### 2. Stack Testing Data

The PTE was also calculated using the emission rate measured during stack testing in the report dated November 30, 2007. The measured HCl rate from the scrubber exhaust was less than 0.01 lb/hour for all three runs. Assuming 99% control efficiency for each scrubber, the uncontrolled HCl emissions were back calculated.

Scrubber 2:  $(100\% - 99\%) / 100\% = 0.01 \text{ lb/X} \rightarrow X = 1 \text{ lb per hour uncontrolled prior to Scrubber 2} \rightarrow \text{Scrubber 1:}$   
 $(100\% - 99\%) / 100\% = 1 \text{ lb/Y} \rightarrow Y = 100 \text{ lbs per hour or } 876,000 \text{ lbs per year uncontrolled prior to Scrubber 1}$  (**438 tons per year**)

### 3. Community Right-To-Know-Act Emission Factors

The PTE was calculated using an emission factor from USEPA Emergency Planning and Community Right-To-Know-Act – Section 313 “Guidance for Reporting Hydrochloric Acid (acid aerosols including mists, vapors, gas, fog, and other airborne forms of any particle size) dated December 1999. For continuous coil at medium sized facilities, the uncontrolled emission factor is 1.1 lbs/HCl per ton processed. Using this information the PTE is calculated as follows.

120 tons per hour x 8760 hours per year x 1.1 lb per ton material produced = 1,156,320 lb per year or **578 tons per year**.

#### 4. NESHAP for Steel Pickling – HCl Process – Background Information for Proposed Standards

The PTE was also estimated from information from National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling – HCl Process – Background Information for Proposed Standards, dated June 1997. Within Table 5-2 of the document, the Model Plant Parameters for Continuous Coil Pickling Processes includes uncontrolled emissions (lb/hr) based on plant size. For medium sized facilities, the uncontrolled emissions are 134 lb/hr for production capacity of 750,000 tons per year and 45 lb/hr for production capacity of 45 tons per year. Using the 750,000 ton per year cap city yields a PTE of **587 tons per year** (134 lb/hr x 8760 hr/yr = 1173840 lb/yr).

It should be noted that Voss Steel is listed as a steel pickling facility that provided information to the USEPA under Section 114 requests, as part of the development of the MACT (see Table 3-4, page 3-34, Facility ID 24). On page 3-41 of the background document the reported processing capacity for Voss Steel was 480,000 tons per year (versus the 720,000 tons per year currently listed on the company website).

#### 5. Wayne County Memorandum – December 4, 1970

Stack testing results included in a December 4, 1970 Wayne County Memorandum indicates “an inlet acid concentration” to the scrubber of 1.5 lb/min. Based on the date of the letter and correspondence it appears that only one scrubber was in operation at that time. Uncontrolled emissions at that time would be 90 lb/hour, equating to a PTE of 788,400 lbs or **394.2 tons per year**.

#### 6. Stack Test Sampling Results – June 21, 1988

Stack testing results provided in memorandum from Voss Steel dated August 5, 1988 (sampling results from June 21, 1988) indicate a scrubber inlet of >97 lb/hr HCl. Uncontrolled emissions at that time would equal a PTE of 849,720 lbs or **424.86 tons per year**.

Based on the above PTE calculations, it appears that Voss is a major source for HCl.

### **FEDERAL REQUIREMENTS**

#### 40 CFR Part 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

HCl is not an organic compound; therefore Subpart Kb is not applicable. The records provided indicate the largest tank at the facility is 17,968 gallons (Fresh Acid Tank #1). Per §60.110b(a) the regulation applies to tanks greater than or equal to 75 cubic meters (19812.9 gallons).

#### 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

The emergency engine at the facility is not subject to 40 CFR Part 60, Subpart IIII as the engine was constructed prior to July 11, 2005 per §60.4200(a)(2).

#### 40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The emergency is engine appears to be subject to 40 CFR Part 63, Subpart ZZZZ per §63.6585. However, the MDEQ AQD is not the delegated authority for this regulation. Therefore applicable conditions of Subpart ZZZZ were not evaluated.

**40 CFR Part 63, Subpart CCC - National Emission Standards for Hazardous Air Pollutants for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants**

The company's PTE of HCl exceeds the major source threshold of 10 tons per year (tpy) making the facility a major source. The facility appears to be an existing source subject to Subpart CCC per §63.1155(a)(1). Per §63.2, an existing source means any affected source that is not a new source. Per §63.2, a new source "means any affected source the construction or reconstruction is commenced after the administrator first proposes a relevant emission standard under this part establishing an emission standard applicable to such source". The pickle line was originally permitted in April 10, 1968 and therefore an existing source. The increase in production capacity identified likely does not meet the definition of reconstruction.

§63.1160(a)(1) – **NOT IN COMPLIANCE** – Shall achieve initial compliance with Subpart CCC no later than June 22, 2001.

At this time, the facility has not demonstrated compliance with all applicable requirements of Subpart CCC.

§63.1160(b), 63.1165(b)(3)– **NOT IN COMPLIANCE** – Shall prepare and keep on record an operation and maintenance plan for each emission control device. The plan shall be incorporated by reference into the source's Title V permit. The plan shall require monitoring and recording the pressure drop across the scrubber once per shift. Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans. Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of fouling. Require an inspection of each scrubber at intervals of no less than 3 months. A record of each inspection, including each item under §60.1160(b)(2)(iv) be maintained and signed by the responsible maintenance official.

At this time, the facility does not have a Title V permit. An operation and maintenance plan for each control device was provided by the company. The plan provided does not specify a frequency of scrubber inspection. According to records provided, the facility does not measure pressure drop across the Raven scrubber.

§63.1157(a)(1) and (2), §63.1161(a) and (b), §63.1162(a)(1) – **NOT IN COMPLIANCE** – Shall conduct initial performance test and establish of scrubber operating parameters. Emissions not to exceed 18 ppmv of HCl or HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent. Conduct annual performance tests to measure the HCl inlet and outlet or the concentration of the HCl exiting the control device. An alternate schedule that is approved by the permitting authority, but no less frequently than every 2.5 years.

At this time, the facility has not conducted annual testing to demonstrated compliance with HCl emission limits. Scrubber operating parameters have not been established.

§63.1162(a)(2), (4), (5) – **NOT IN COMPLIANCE** – Install, operate, and maintain systems for the measurement and recording of the scrubber makeup water flow rate, and if required, recirculation water flow rate. These flow rates must be continuously monitored and recorded at least once per shift. Operation of the wet scrubber with excursions of scrubber makeup flow rate and recirculation water flow rate less than minimum values established during the performance tests or tests will require initiation of corrective action as specified by maintenance requirements of §63.1160(b). Each monitoring device shall be calibrated not less frequently than once per year.

At this time the facility has not submitted calibration records. Scrubber operating parameters have not been established.

§63.1163(a), (d), and (e) – **NOT IN COMPLIANCE** – Shall submit initial notification, notification of performance test, and notification of compliance status.

At this time, the AQD has not received any notifications required under Subpart CCC.

§63.1164(a) and (c) – **NOT IN COMPLIANCE** – Submittal of test results within 60 days after each performance test. Shall report malfunctions in a semiannual report.

At this time, the facility has failed to conduct annual performance tests and test reports have not been submitted. Semiannual reports have not been submitted.

**40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters**

Based on the PTE calculations above, the facility is a major source for HAPs. The boilers at the facility meet the definition of an industrial boiler (§63.7575), and therefore appear subject to Subpart DDDDD per §63.7485.

§63.7495(b) – **NOT IN COMPLIANCE** - Must comply with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2016, for existing boilers and process heaters, unless an extension has been granted per 40 CFR 63.6(i).

At this time, the facility has not fully complied with Subpart DDDDD.

§63.7500(a)(1), Table 3 Nos. 1-4, §63.7500(e), §63.7510(e), §63.7515(d) – **NOT IN COMPLIANCE** - Complete a tune-up every 2 years (25 months) for boilers greater than 5 million Btu per hour and less than 10 million Btu per hour. Complete a tune-up annually (13 months) for boilers greater than 10 million Btu per hour. Complete the one-time energy assessment no later than January 31, 2016.

At this time, the facility appears to conduct tune ups and inspections of the boilers on an annual basis. It is unknown if the tune ups meet all the requirements specified in §63.7540(a)(10) and (11). At this time the facility has not completed the one-time energy assessment.

§63.7500(a)(3) – **COMPLIANCE** -The permittee must operate and maintain affected sources in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

At the time of inspection, it appears that the facility is in compliance with this requirement.

§63.7545(e) – **NOT IN COMPLIANCE** - Must submit a Notification of Compliance Status that includes each boiler or process heater before the close of business on the 60th day following the completion of the initial compliance demonstrations for all boiler or process heaters at the facility. The Notification of Compliance Status report must contain the following information.

At this time the facility has not submitted a Notification of Compliance Status.

§63.10(a)(5), §63.7550(b), §63.7550(h)(3)) – **NOT IN COMPLIANCE** - Must submit boiler tune-up compliance reports. The first compliance report shall cover the period January 31, 2016 thru December of the year in which the tune up was completed and must be postmarked or submitted no later than March 15<sup>th</sup> of the reporting year that immediately follows the year in which the tune-up was completed. Subsequent compliance reports must be postmarked or submitted by March 15<sup>th</sup> of the year following the tune-up and must cover the applicable 1, 2, or 5 year period starting from January 1 of the year following the previous tune-up to December 31 (of the latest tune-up year). Compliance reports must be submitted using the Compliance and Emissions Data Reporting Interface (CEDRI) which is accessed through the EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). If the reporting form is not available in CEDRI at the time the compliance report is due, a hardcopy of the compliance report shall be submitted to the state and EPA Region 5. At the discretion of the Administrator, the permittee must submit these reports, in the format specified by the Administrator.

At this time the facility has not submitted boiler tune-up compliance reports.

**PERMIT TO INSTALL EXEMPTIONS****Natural Gas Boilers**

The boilers present at the facility are exempt from PTI requirements under the following Rule.

R336.1282(2)(b)(i): **COMPLIANCE** - "Permit to install does not apply to.. Sweet natural gas, liquefied petroleum gas, or a combination thereof and the equipment has a rated heat input capacity of not more than 50,000,000 Btu per hour."

The largest boiler is rated at approximately 22,050,000 Btu/hr.

### Cold Cleaner

The cold cleaner at the facility is defined as cold cleaner as per R336.1103(aa). The cleaning material used (Safety Kleen Premium Solvent) has a boiling point of 350 °F. The cold cleaner is not heated. The cold cleaner has an air/vapor interface of 7.5 square feet.

The cold cleaner appears to be exempt from PTI requirements under the following rule.

R336.1281(2)(h): "The requirement to obtain a PTI does not apply to cold cleaners that have an air/vapor interface of not more than 10 square feet."

The parts washer is subject to R336.1707 for new cold cleaners. The vapor pressure of Safety Kleen Premium Solvent is 0.2 mm Hg (0.0039 psi).

R336.1707(3)(a) – **NOT IN COMPLIANCE** - a cover shall be installed and closed whenever parts are not being handled in the cleaner. According to correspondence from Mr. Squiers, the cold cleaner is not heated. During the inspection the cover was open. Mr. Fischer was notified that the cover should be closed.

R336.1707(4) – **NOT IN COMPLIANCE** – Written operational procedures shall be posted in an accessible, conspicuous location near the cold cleaner. The facility did not have operational procedures posted. A "DEQ Cold Cleaner Operating Procedures" sticker was provided to Mr. Fischer.

### Emergency Generator

The generator at the facility operates at 365 KW/hr at maximum load. Using the performance data provided, the maximum rated heat input was calculated. The maximum fuel consumption rate (29.11 gallons per hour at 365 KW), in conjunction with the heating value for diesel (137,000 BTU per gallon [AP-42, Appendix A]) were used to calculate a maximum heat input for the emergency generator. Based on the calculated heat input of 3.99 MMBTU/hour, the emergency generator is exempt from PTI requirements under the following Rule.

R336.1285(2)(g): **COMPLIANCE** - "Permit to install does not apply to...Internal combustion engines that have less than 10,000,000 Btu/hour maximum heat input."

### Slitting Process Area

The slitting process area appears to be exempt from PTI requirements under the following Rule.

R336.1285(2)(l)(vi)(B): **COMPLIANCE** - "The requirement to obtain a PTI does not apply to...equipment for carving, cutting, routing, turning, drilling, machining...etc. metal and emissions are released only to the general in-plant environment."

### Fresh Acid and Waste Acid Storage Tanks

Based on the information provided, the fresh acid tanks store HCl that is approximately 36% by weight. According to correspondence from Mr. Squiers, dated March 16, 2017, two of the fresh acids tanks were installed in late 1997, and one tank (rubber lined) was installed sometime prior to 1989. The installation of the fresh acid storage tanks in late 1997 at the facility do not meet the PTI exemption listed below. It is unknown if the rubber lined tank was originally permitted in 1968.

R336.1284(2)(h)(iv): **NOT IN COMPLIANCE** - "Permit to install does not apply to...storage and water dilution of aqueous solutions of inorganic salts, bases, and the following acids...hydrochloric acid that is not more than 11% by weight."

### Wastewater Treatment System

The wastewater treatment system appears to be exempt from PTI requirements under the following Rule.

R336.1285(2)(m): **COMPLIANCE** - "The requirement to obtain a PTI does not apply to...wastewater treatment equipment.."

According to Mr. Squiers the wastewater treatment system does not treat VOCs.

## **RULE 201**

### **Facility Production Capacity Increase**

Based on the production capacity for Voss Steel (480,000 tons per year) identified in the "NESHAP for Steel Pickling – HCl Process – Background Information for Proposed Standards" versus the 720,000 tons per year currently listed on the company website, it appears the facility has increased production (240,000 tons per year) capacity sometime between the mid 1990's to present day. Additionally, when reviewing permit files (microfiche) for C-4501, notes indicate a fresh acid tank of 15,000 gallons. Correspondence dated March 1, 2017 from Mr. Squiers indicates a total fresh acid tank capacity of 50,936 gallons (2 tanks at 17968 gallons, 1 tank at 15,000 gallons). The increase in fresh acid tank capacity in 1997 correlates with the facility production capacity increase.

This increase in production capacity appears to be a violation of Rule 201.

"Rule 201. (1) Except as allowed in R 336.1202, R 336.1277 to R 336.1291, or R 336.2823(15) a person shall not install, construct, reconstruct, relocate, or modify any process or process equipment, including control equipment pertaining thereto, which may emit any of the following, unless a permit to install that authorizes such action is issued by the department.

(a) Any air pollutant regulated by title I of the clean air act and its associated rules, including 40 C.F.R. §51.165 and §51.166, adopted by reference in R 336.1902.

(b) Any air contaminant.

A person who plans to install, construct, reconstruct, relocate, or modify any such process or process equipment shall apply to the department for a permit to install on an application form approved by the department and shall provide the information required in R 336.1203."

The installation of the two fresh acid tanks in 1997 would represent a modification because an increase in production capacity would represent an increase in HCl emissions that is not already allowed by a permit to install.

### **HCl (fresh acid) Storage Tanks**

As described above, the fresh acid tanks store HCl that is approximately 36% by weight, not meeting the permit to install exemption R336.1284(2)(h)(iv).

The installation of the two fresh acid tanks in 1997 is a violation of Rule 201.

## **RENEWABLE OPERATING PERMIT**

The company's PTE of HCl exceeds the major source threshold of 10 tons per year (tpy) making the facility a major source under Rule 211.

A major source is defined as any source (facility) that actually emits or has the PTE 10 tons per year of any hazardous air pollutant, 25 tons per year of any combination of hazardous air pollutants, or 100 tons per year of any criteria pollutant (NOx, Sulfur Dioxide, Carbon Monoxide, Particulate Matter, Volatile Organic Compounds, or Lead).

Under the State of Michigan's Air Pollution Control law and the federal Clean Air Act, a Renewable Operating Permit (ROP) program has been developed and implemented in Michigan. This program requires major sources of air emissions to obtain a facility-wide air use permit. This permit serves as a mechanism for consolidating and clarifying all air pollution control requirements which apply to the source. Rule 210(5) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires major sources to submit an application to the DEQ, AQD not more than 12 months after a stationary source commences operation as a major source, as defined by Rule 211(1)(a) of Act 451.

To date, the AQD has not received a ROP application from Voss. This constitutes a violation of Rule 210(1) of Act 451 which requires that a source not operate any emission units at a source required to obtain a ROP unless



a timely and administratively complete application has been received by the DEQ. Per Rule 210(4), a ROP application should have been received by July 30, 1996 (former Rule 210(4)(c) using SIC code 3547 – pickling lines). As a result of the failure to submit a timely and administratively complete application in accordance with the requirements of Rule 210(5) of Act 451, this facility has failed to obtain an "application shield".

**APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS**

Not Applicable. All lots are paved.

**MAERS**

At this time, the facility is not required to submit MAERS.

**FINAL COMPLIANCE DETERMINATION:**

At this time, this facility appears to be in violation with Rule 201 (fresh acid tank installation and production capacity increase), Rule 210 (Renewable Operating Permits), Rule 707(3)a and Rule 707(4) (cold cleaner), 40 CFR Part 63, Subpart CCC (Steel Pickling MACT), and 40 CFR Part 63, Subpart DDDDD (Major Source Boiler MACT). A violation notice will be issued.

NAME



DATE

3/28/17

SUPERVISOR

JK