

B3472  
MAVILA

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

B347247284

FACILITY: VOSS INDUSTRIES-VOSS TAYLOR DIV		SRN / ID: B3472
LOCATION: 7925 BEECH DALY, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Robert Squiers, Plant Manager		ACTIVITY DATE: 10/19/2018
STAFF: Todd Zynda	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: October 19, 2018 Inspection		
RESOLVED COMPLAINTS:		

PURPOSE OF INSPECTION: Targeted  
 INSPECTED BY: Todd Zynda (AQD)  
 PERSONNEL PRESENT: 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 acid pickling, special oils, slitting, and corrective leveling. Voss currently operates 5 days per week, 24 hours a day with the capacity to operate 7 days a week depending on customer demands. 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

During June 2017, two complaints were received regarding odors from Voss. As a result, complaint investigations were conducted on June 6 and 13, 2017. During both complaint investigations a Rule 901 violation was not verified. There have not been any further complaints since that time.

During the inspection on February 14, 2017, the facility was determined to be in noncompliance 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 was issued on April 4, 2017. The facility was referred to AQD Enforcement Unit on April 24, 2017. On September 8, 2017 the United States Environmental Protection Agency (USEPA) Region 5 issued a Notice of Violation (NOV) and Finding of Violation (FOV) to Voss. Ultimately, the violations identified by the MDEQ AQD are being addressed by the USEPA Region 5.

With the issuance of PTI 133-17 on November 22, 2017, the facility obtained enforceable restrictions limiting the potential to emit of HAPs to less than 8.9 tons per year on an individual basis and 22.5 tons per year on an aggregate basis. Thus, when the USEPA rescinded the Once-In Always-In (OIAI) policy on January 25, 2018, the facility reclassified to a synthetic minor (area) source and was no longer subject to either the Steel Pickling MACT or the Title V permitting program. On July 24, 2018 the facility obtained a revised PTI 133-17A which retained the HAP emission limitations and removed requirements of the Steel Pickling MACT.

### OUTSTANDING CONSENT ORDERS

None

### OUTSTANDING VNs

The violation notice issued on April 4, 2017 is being addressed by the USEPA Region 5 through the issuance of NOV and FOV dated September 8, 2017.

### INSPECTION NARRATIVE

On October 19, 2018 the MDEQ Air Quality Division (AQD) inspector Mr. Todd Zynda conducted an inspection of Voss located at 7925 Beech Daly, Taylor, Michigan. During the inspection Mr. 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 Permit to Install (PTI) No. 133-17A. PTI 133-17A was issued on July 24, 2018 following the rescinding of the OIAI policy by the USEPA on January 25, 2018. PTI 133-17A restricts hazardous air pollutant emissions to less than 8.9 tons per year on an individual basis and 22.5 tons per year on an aggregate basis and removes major source MACT (40 CFR Part 63, Subpart CCC) requirements. Based on the issuance of PTI 133-17A, Voss is no longer required to submit a Renewable Operating Permit application.

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 PTI 133-17A record keeping requirements and facility operations were discussed.

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 during the previous inspection, 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. During the inspection, pickling tank #4 meter read 5.789% HCl and 178 °F and tank #3 meter read 6.762% and 179 °F. Following the acid tanks, the strip is passed through a spray rinse tank. A rust inhibitor (soap or oil based coating – SDS were provided during the previous inspection) 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. An alarm sounds at 1.8 inches water. During the inspection the gauge on the dust collector read 0.3 inches water. There were no visible emissions at the dust hog exhaust.

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. Fresh acid is received at approximately a 36% concentration.

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 rate 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. During the inspection the scrubber make water was as follows: Heil – 11.30 gpm; Raven – 2.74 gpm.

According to records provided, HCl %, inlet scrubber water flow rate (gpm), pressure drop are monitored daily (approximately once a shift) for both scrubbers.

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 previous 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 during the previous inspection. During the inspection, the cold cleaner lid was closed. Operating instructions were posted.

Following observation of the slitting area, the facility emergency generator was observed. The 365 KW diesel emergency generator was constructed on August 31, 1989, and installed in 1990.

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.

During the inspection the second building located to the south of the main production building was not observed. During the previous inspection it was observed that the second building is used for overflow storage of steel coils.

## **APPLICABLE RULES/PERMIT CONDITIONS**

### **PTI 133-17A**

#### **EUTENSIONLEV**

SC III.1. **COMPLIANCE.** Shall not operate EUTENSIONLEV unless malfunction abatement plan (MAP) has been submitted and implemented. According to the facility there have been no malfunctions of air pollution control equipment. The facility appears to be complying with the MAP for the EUTENSIONLEV. According to Mr. Squiers, the facility has maintained the baghouse in accordance with MAP requirements. Baghouse maintenance records were provided. After several iterations with the company the MAP conditions were agreed upon by the AQD and Voss on December 10, 2018.

SC IV.1. **COMPLIANCE.** Shall not operate EUTENSIONLEV unless the baghouse is installed, maintained, and operated in accordance with manufacturers recommendations. The facility appears to be meeting this requirement.

SC IV.2. **COMPLIANCE.** Shall not operate EUTENSIONLEV unless a pressure drop alarm for the baghouse is installed, maintained, and operated in a satisfactory manner. The facility appears to meet this requirement. The alarm sounds at 1.8 inches (or greater).

SC VI. 1. **NOT IN COMPLIANCE.** Shall monitor and record in a satisfactory manner, the pressure drop across the baghouse once per shift. The facility was unable to produce pressure drop records. According to the facility the pressure drop has not been greater than 0.5 inches all year. The facility has implemented once per shift readings going forward.

SC VIII. 1. **COMPLIANCE.** Baghouse exhaust shall vent at approximately 11 feet above ground surface. The stack appears to meet this requirement. Measurements were not collected.

#### **FGSCRUBBERS**

SC I.1, V.1. **COMPLIANCE.** HCl emission shall be not greater than 18 ppmv (hourly) or, alternatively, not greater than the mass emission rate that corresponds to a collection efficiency of less than 97 percent (hourly). Testing upon request. Testing was previously conducted on June 1, 2017. At that time, the scrubber outlet was

measured at 22 ppmv with a scrubber removal efficiency of 98.5%. The facility demonstrated compliance with the 97% collection efficiency. Continued compliance is based on the scrubber performance (i.e. minimum scrubber flow rates established during testing). As described below under SC III.1, 2, and 3, there are periods of time where the flow rates were less than the minimum scrubber flow rates established during stack testing. Therefore, for those periods compliance cannot be determined.

SC III. 1, 2, and 3. **NOT IN COMPLIANCE.** Scrubber shall not operate unless the MAP as described in Rule 911 (2) for the scrubber pollution control system is implemented and maintained. Shall not operate FGSCRUBBERS unless the scrubber pollution control system is installed, maintained and operated in a satisfactory manner. Shall use fresh water for the scrubber make-up water and maintain the makeup water flow rate and the minimum recirculation water flow rate at or above the minimum rates specified in the MAP. The facility stack tested on June 1, 2017, setting minimum flow rates under MACT CCC (ultimately incorporated into PTI 133-17A and the associated MAP). The minimum flow rates established during the stack testing are as follows. Heil scrubber tower (second tower) minimum makeup water flow rate of 9.1 gpm. Raven scrubber tower (second tower) minimum makeup water flow rate of 2.8 gpm. After several iterations with the company the minimum flow rates were incorporated into the MAP. The facility provided scrubber flow rates for January 1, 2018 through October 25, 2018. The following days were identified where the flow rate at the Heil scrubber was less than the minimum flow rate established during stack testing and included in the MAP.

1/14/18, 11:30 PM – 0.8 gpm  
1/21/18, 11:30 PM – no reading  
1/28/18, 11:30 PM – 0.8 gpm  
2/28/18, 7:00 AM – 9 gpm  
3/4/18, 11:30 PM – no reading  
3/10/18, 7:30 AM – 8 gpm  
3/17/18, 7:30 AM – 8 gpm  
3/23/18, 7:30 AM – 8 gpm  
4/11/18, 11:30 PM – no reading  
4/11/18, 7:30 AM – 7.5 gpm  
4/11/18, 3:30 PM – 7.5 gpm  
4/16/18, 3:30 PM – no reading  
4/22/18, 11:30 PM – no reading  
4/28/18, 7:30 AM – 8 gpm  
4/29/18, 7:00 AM – 8 gpm  
4/29/18, 11:30 PM – no reading  
5/6/18, 11:30 PM – no reading  
5/12/18, 7:30 AM – no reading  
5/25/18, 7:00 AM – 9 gpm  
5/26/18, 7:00 AM – 9 gpm  
5/27/18, 7:00 AM – 9 gpm  
5/29/18, 3:30 AM – no reading  
6/2/18, 7:00 AM – 9 gpm  
6/3/18, no time provided – 9 gpm  
6/30/18, 7:30 AM – 9 gpm  
7/4/18, 7:00 AM – 9 gpm  
7/5/18, 7:00 AM – 9 gpm  
7/6/18, 7:00 AM – 9 gpm  
7/7/18, 7:00 AM – 9 gpm  
7/8/18, 7:00 AM – 9 gpm  
7/14/18, 7:30 AM – 9 gpm  
7/15/18, 7:30 AM – 9 gpm  
7/16/18, 7:30 AM – 9 gpm  
7/18/18, 7:30 AM – 9 gpm  
7/20/18, 11:30 AM – no reading  
7/21/18, 7/21/18 – 8 gpm  
7/22/18, 7:30 AM – 8 gpm  
7/22/18, 11:30 PM – no reading  
7/28/18, 6:00 AM – 9 gpm  
7/29/18, 7:30 AM – 9 gpm  
7/31/18, 3:30 PM – 9 gpm  
8/5/18, 7:00 AM – 9 gpm

8/5/18, 11:30 PM – 8 gpm  
8/7/18, 7:30 AM – 9 gpm  
8/9/18, 11:30 PM – 8 gpm  
8/10/18, 7:30 AM – 8 gpm  
8/12/18, 11:30 PM – 8 gpm  
8/14/18, 7:30 AM – 9 gpm  
8/15/18, 7:30 AM – 9 gpm  
8/15/18, 3:30 PM – 9 gpm  
8/15/18, 11:30 PM – 8 gpm  
8/16/18, 7:30 AM – 9 gpm  
8/16/18, 3:30 PM – 9 gpm  
8/18/18, 7:30 AM – 8 gpm  
8/19/18, 7:30 AM – 8 gpm  
8/19/18, 11:30 PM – 8 gpm  
8/20/18, 7:30 AM – 8 gpm  
8/20/18, 3:30 PM – 8 gpm  
8/25/18, 7:30 AM – 8 gpm  
8/26/18, 7:30 AM – 8 gpm  
8/27/18, 7:30 AM – 7 gpm  
8/27/18, 3:30 PM – 7 gpm  
9/1/18, 7:00 AM – 9 gpm  
9/2/18, 7:00 AM – 9 gpm  
9/3/18, 7:30 AM – 9 gpm  
9/4/18, 7:30 AM – 8 gpm  
9/7/18, 3:30 PM – 8 gpm  
9/9/18, 7:00 AM – 9 gpm  
9/15/18, 7:30 AM – 9 gpm  
9/16/18, 7:30 AM – 9 gpm  
9/17/18, 11:30 PM – no reading  
9/18/18, 7:30 AM – 8 gpm  
9/18/18, 11:30 PM – no reading  
9/21/18, 7:00 AM – 9 gpm  
9/22/18, 7:00 AM – 9 gpm  
9/23/18, 7:00 AM – 9 gpm  
9/23/18, 11:30 PM – no reading  
9/24/18, 7:30 AM – 9 gpm  
10/7/18, 7:00 AM – 9 gpm  
10/13/18, 7:00 AM – 9 gpm  
10/14/18, 11:30 PM – no reading  
10/14/18, 7:00 AM – 9 gpm

The following days were identified where the flow rate at the Raven scrubber was less than the minimum flow rate established during stack testing and included in the MAP.

1/21/18, 11:30 PM – no reading  
3/4/18, 11:30 PM – no reading  
3/24/18, 7:30 AM – 2.7 gpm  
3/26/18, 7:30 AM – 2.7 gpm  
4/2/18, 7:30 AM – 2.7 gpm  
4/4/18, 7:30 AM – 2.7 gpm  
4/6/18, 7:30 AM – 2.7 gpm  
4/10/18, 7:30 AM – 2.7 gpm  
4/11/18, 11:30 AM – no reading  
4/12/18, 7:30 AM – 2.7 gpm  
4/13/18, 7:30 AM – 2.7 gpm  
4/16/18, 3:30 PM – no reading  
4/20/18, 7:30 AM – 2.5 gpm  
4/22/18, 11:30 PM – no reading  
4/27/18, 7:30 AM – 2.7 gpm  
4/29/18, 11:30 PM – no reading  
4/30/18, 3:30 PM – 2.7 gpm

5/1/18, 7:30 AM – 2.7 gpm  
5/2/18, 7:30 AM – 2.7 gpm  
5/4/18, 7:30 AM – 2.7 gpm  
5/4/18, 3:30 PM – no reading  
5/6/18, 11:30 PM – no reading  
5/8/18, 7:30 AM – 2.6 gpm  
5/9/18, 7:30 AM – 2.7 gpm  
5/22/18, 7:30 AM – 2.7 gpm  
5/29/18, 3:30 AM – no reading  
6/18/18, 7:30 AM – 2.7 gpm  
6/19/18, 7:30 AM – 2.7 gpm  
7/9/18, 11:30 PM – 2.7 gpm  
7/18/18, 3:30 PM – 2.7 gpm  
7/20/18, 11:30 PM – no reading  
7/22/18, 11:30 PM – no reading  
7/23/18, 7:30 AM – 2.6 gpm  
7/24/18, 7:30 AM – 2.6 gpm  
7/27/18, 3:30 PM – 2.7 gpm  
7/30/18, 3:30 PM – 2.7 gpm  
7/31/18, 3:30 PM – 2.7 gpm  
8/1/18, 3:30 PM – 2.7 gpm  
8/2/18, 3:30 PM – 2.7 gpm  
8/7/18, 7:30 AM – 2.7 gpm  
8/8/18, 7:30 AM – 2.7 gpm  
8/16/18, 7:30 AM – 2.7 gpm  
9/17/18, 11:30 PM – no reading  
9/18/18, 11:30 PM – no reading  
9/23/18, 11:30 PM – no reading  
10/14/18, 11:30 PM – no reading  
10/19/18, 7:30 AM – 2.7 gpm

Based on the above flow rates that are below the minimum flow rate established during stack testing on June 1, 2017, the MAP is considered insufficient as it does not address corrective actions for instances when the flow rate does not meet the minimum.

SC IV. 1. **COMPLIANCE.** Shall install a closed-vent system for each hydrochloric acid storage vessel. Loading and unloading shall be conducted through enclosed lines. During the inspection the facility appeared to meet this requirement.

SC IV. 2. **COMPLIANCE.** Shall install, operate and maintain in a satisfactory manner, systems for measurement and recording of the scrubber makeup water and recirculation water flow rate. The facility operates and maintains scrubber flow rates. Records were provided for January 1, 2018 through October 25, 2018.

SC VI.2. **NOT IN COMPLIANCE.** Shall monitor the scrubber makeup water flow rate and recirculation water flow rate on a continuous basis and record the scrubber makeup water flow rate at least once per shift. Records were provided for January 1, 2018 through October 25, 2018. The following days did not have flow rate readings during one of the shifts, as indicated by a blank in the provided record. 1/21/18, 3/4/18, 4/11/18, 4/16/18, 4/22/18, 4/29/18, 5/4/18, 5/6/18, 5/12/18, 5/29/18, 7/20/18, 7/22/18, 9/17/18, 9/18/18, 9/23/18, and 10/14/18.

SC IV. 3 and VI.1. **COMPLIANCE.** Shall install, operate and maintain in a satisfactory manner a gauge to measure the pressure drop across the scrubber. The facility maintains pressure drop readings and is recorded once per shift. Records were provided for January 1, 2018 through October 25, 2018.

SC VI.3. **COMPLIANCE.** Shall keep records of malfunctions of process equipment and pollution control equipment, all maintenance performed on the air pollution control equipment, actions taken during periods of malfunction to minimize emissions, records of performance test results and measurements, scrubber make up water flow rate, calibration and manufacturers certification of monitoring devices, records of each maintenance inspection, repair, replacement taken in accordance with MAP, records of malfunctions, maintenance, and corrective action in accordance with MAP. According to the facility submittal on October 19, 2018, there have been no known malfunctions of the process or air pollution control equipment in 2018. Scrubber flow rate calibration records and maintenance records were provided for the scrubbers. It is recommended that that MAP

be updated to reflect corrective action or maintenance to be conducted when flow rates are below the established minimum flow rates.

SC VIII. 1. **COMPLIANCE.** Stack parameters of 36 inches maximum exhaust and minimum 78 feet above ground surface. The stack appeared to meet these conditions. Measurements were not collected.

#### FGFACILITY

SC I. 1 and 2, VI.1. **COMPLIANCE.** HAP emissions shall be less than 8.9 tpy on a individual basis and 22.4 on an aggregate basis. Records to be maintained in a satisfactory manner. The facility reports 12-month rolling emissions from November 2017 through October 2018 as 3.01 tons. Emissions are calculated using operating hours and stack testing results from June 2017.

#### **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. Furthermore, 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 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**

PTI 133-17 issued on November 22, 2017 restricts hazardous air pollutant emissions to less than 8.9 tons per year on an individual basis and 22.5 tons per year on an aggregate basis. PTI 133-17A was issued on July 24, 2018 following the rescinding of the OIAI policy by the USEPA on January 25, 2018 and removes MACT requirements from the PTI. The facility is no longer subject to major source MACT (40 CFR Part 63, Subpart CCC) requirements.

##### **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 discussion above, the facility is no longer subject to major source MACT (40 CFR Part 63, Subpart DDDDD) requirements.

##### **40 CFR Part 63, Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources**

The AQD is not the delegated authority for this regulation. Subpart JJJJJJ was not evaluated.

#### **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) –**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 closed.

R336.1707(4) – **COMPLIANCE** – Written operational procedures shall be posted in an accessible, conspicuous location near the cold cleaner. During the inspection operational procedures were posted.

### **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 during the previous inspection, 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 previously did not meet at the PTI exemption listed below.

R336.1284(2)(h)(iv): "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."

The fresh acid tanks and spent pickle liquor tanks are now permitted under PTI 133-17A, FGSCRUBBERS.

### **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.

**APPLICABLE FUGITIVE DUST CONTROL PLAN CONDITIONS**

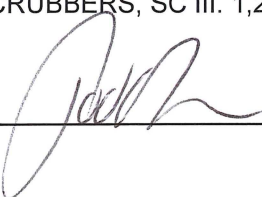
Not Applicable. All lots are paved.

**MAERS**

The 2017 MAERS submittal was timely and complete. The MAERS audit was passed on April 10, 2018.

**FINAL COMPLIANCE DETERMINATION:**

At this time, this facility appears to be in violation of PTI 133-17A, EUTENSIONLEV, SC VI.1 and FGSCRUBBERS, SC III. 1,2,and 3, and VI.2. A violation notice will be issued.

NAME 

DATE 12/20/18

SUPERVISOR 