Facility Name: **BlueScope Coated Products, LLC**
City: Marietta
County: Cobb
AIRS #: 04-13-067-000078

Application #: TV-614750
Date Application Received: November 10, 2021
Permit No: 3479-067-0078-V-06-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name:

   BlueScope Coated Products, LLC

   The facility ownership is being transferred from Metal Coaters to BlueScope Coated Products, LLC through Application No. 28575, which is incorporated into this application, Application No. 614750.

2. Parent/Holding Company Name

   BlueScope Coated Products, LLC

3. Previous and/or Other Name(s)

   Metal Coaters, LLC
   Metal Coaters
   Metal Coaters of Georgia, Inc.
   Prior Coater Metals Company
   American Coaters of Georgia, Inc.
   Monier Coaters of Georgia, Inc.

4. Facility Location

   1150 Marietta Industrial Drive, N.E.
   Marietta, Georgia 30062

5. Attainment, Non-attainment Area Location, or Contributing Area

   The facility is located in the Atlanta ozone attainment area.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
3479-067-0078-V-05-0	December 2, 2016	Title V Renewal

D. Process Description

1. SIC Codes(s)

3479 – Coating, Engraving, and Allied Services, Not Elsewhere Classified

2. Description of Product(s)

The facility produces repainted shaft steel in coil form.

3. Overall Facility Process Description

Steel coil is unrolled, washed, rinsed, and then coated with both a prime and finish coating on a continuous line. After each coat is applied, the steel is cured in a high-bake oven. The finished product is rolled back into its original coil form and packaged for shipment.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The facility is not one of the named 28 sources under Prevention of Significant Deterioration (PSD) regulations. The facility has an 89.4 tons per year (tpy) volatile organic compound (VOC) limit to avoid PSD major source status. All other applicable pollutants are limited to minor source thresholds. These limits allow the facility to avoid New Source Review (NSR) regulations as well.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM_{10}	✓			✓
$PM_{2.5}$	✓			✓
SO_2	✓			✓
VOC	✓	✓		
NO_x	✓		✓	
CO	✓			✓
TRS	n/a			
H_2S	n/a			

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
Individual HAP	✓		✓	
Total HAPs	✓		✓	
Total GHGs	✓			✓

3. MACT Standards

Because the facility agreed to limit Hazardous Air Pollutants (HAP) to minor threshold levels, MACT 40 CFR 63 Subpart SSSS "Surface Coating of Metal Coil" does not apply. Moreover, this HAP limit avoids having the facility be subject to any Maximum Available Control Technology (MACT) standards.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	n
Program Code 8 – Part 61 NESHAP	n
Program Code 9 - NSPS	y
Program Code M – Part 63 NESHAP	n
Program Code V – Title V	y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

The facility had previously accepted a 100 tpy VOC limit for NSR avoidance. In Permit No. 3479-067-0078-V-03-1 the facility accepted a VOC limit of 89.4 tpy to avoid both PSD and NSR. This limit was applied only to the Coil Coating Line Curing Oven. However, the Coil Coating Oven, Prime Coater, and Finish Coater were placed on the same production line. Therefore, the 89.4 tpy VOC limit was made to apply facility wide. This limit applies to this Title V renewal.

The facility previously accepted a 10 tpy individual HAP limit and 25 tpy combined HAP limit for MACT Avoidance. This limit applies to this Title V renewal.

The facility previously accepted a 25 tpy Nitrogen Oxides (NO_x) limit to avoid Reasonable Available Control Technology (RACT) regulations and Georgia State Rule 391-3-1-.02(2)(yy). This limit applies to this Title V renewal.

B. Applicable Rules and Regulations

Not applicable.

C. Compliance Status

BlueScope Coated Products, LLC submitted their Title V Renewal Application late on November 10, 2021. The facility's existing permit expired on December 2, 2021. However, Environmental Protection Division Air Quality Consent Order (EPD-AQC) 7120 allows operation to continue until the Title V Renewal is issued.

D. Permit Conditions

Condition 2.1.1 contains the facility wide emissions cap for VOC such that the facility is not classified as a major source under PSD.

Condition 2.1.2 contains the facility wide emissions cap for HAP such that the facility avoids applicability of 40 CFR 63 Subpart SSSS.

Condition 2.1.3 contains the facility wide emissions cap for NO_x such that the facility avoids RACT regulations and Georgia State Rule 391-3-1-.02(2)(yy) "Emissions of Nitrogen Oxides from Major Sources."

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
P001	Coil Coating Line Curing Oven	40 CFR 60 Subpart A 40 CFR 60 Subpart TT 391-3-1-.02(2)(g) 391-3-1-.02(2)(v)	C001	Thermal Oxidizer
P002	Prime Coater	40 CFR 60 Subpart A 40 CFR 60 Subpart TT 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(v)	C001	Thermal Oxidizer
P003	Finish Coater	40 CFR 60 Subpart A 40 CFR 60 Subpart TT 391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(v)	C001	Thermal Oxidizer

B. Equipment & Rule Applicability

As pieces of equipment which apply VOC containing coating to metal coils, the Coil Coating Line Curing Oven (ID No. P001), the Prime Coater (ID No. P002), and the Finish Coater (ID No. P003) are subject to Georgia State Rule 391-3-1-.02(2)(v) "VOC Emissions from Coil Coating."

As pieces of equipment which can generate visible emissions and emit particulate matter, the Prime Coater (ID No. P002) and the Finish Coater (ID No. P003) are subject to Georgia Rules 391-3-1-.02(2)(b), "Visible Emissions" and 391-3-1-.02(2)(e), "Particulate Emissions from Manufacturing Processes."

As a new fuel burning source which emits Sulfur Dioxide (SO_2), the Coil Coating Line Curing Oven (ID No. P001) is subject to Georgia State Rule 391-3-1-.02(2)(g), "Sulfur Dioxide."

Emission and Operating Caps:

40 CFR 60 Subpart TT limits the discharge from coatings to 10% of the VOCs contained in those coatings for each calendar month (90 percent emission reduction) and requires operation of the Thermal Oxidizer (ID No. C001) at a proven destruction efficiency temperature.

Georgia State Rule 391-3-1-.02(2)(b) limits the opacity of discharges from the Prime Coater (ID No. P002) and the Finish Coater (ID No. P003) to 40 percent.

Georgia State Rule 391-3-1-.02(2)(e) limits particulate matter emissions from the Prime Coater (ID No. P002) and the Finish Coater (ID No. P003) to $4.1P^{0.67}$ for process input weight rates up to and including 30 tons per hour, where P is the processing weight, and $55\ P^{0.11} - 40$ for process input weight rates above 30 tons per hour.

Georgia State Rule 391-3-1-.02(2)(v) limits coil coatings to 2.6 pounds of VOC per gallon of coating excluding water or 4.02 pounds of VOC per gallon of coating solids and requires Thermal Oxidizer (ID No. C001) to maintain a 90 percent destruction efficiency.

Georgia State Rule 391-3-1-.03(2)(c) restricts the fuel used in the Coil Coating Line Curing Oven (ID No. P001) and the Thermal Oxidizer (C001) to natural gas, except during natural gas curtailment periods when propane may be used.

Rules and Regulations Assessment:

The Coil Coating Line Curing Oven (ID No. P001), the Prime Coater (ID No. P002), and the Finish Coater (ID No. P003) are subject to 40 CFR 60 Subpart TT, "Standards of Performance for Metal Coil Surface Coating." Moreover, they are subject to 40 CFR 60 Subpart A, "General Provisions."

The equipment pieces at the facility do not perform any spray-painting operations. Therefore, 40 CFR 63 Subpart HHHHHH, "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources" does not apply.

C. Permit Conditions

Condition 3.3.1 includes the general applicability statement for 40 CFR 60 Subpart A and 40 CFR 60 Subpart TT.

Condition 3.3.2 applies the monthly VOC discharge limit from coatings applied in the Prime Coater (ID No. P002) and the Finish Coater (ID No. P003) per 40 CFR 60 Subpart TT.

Condition 3.3.3 requires the Thermal Oxidizer (ID No. C001) to operate at a proven destruction efficiency temperature per 40 CFR 60 Subpart TT when the Coil Coating Line Curing Oven (ID No. P001), the Prime Coater (ID No. P002), and the Finish Coater (ID No. P003) are operating. This condition has been reworded to specify the emission units.

Condition 3.4.1 limits the pounds of VOC per gallon of coating excluding water per Georgia State Rule 391-3-1-.02(2)(v).

Condition 3.4.2 requires the Thermal Oxidizer (ID No. C001) to maintain the proper destruction efficiency to enforce Condition 3.4.1 per Georgia State Rule 391-3-1-.02(2)(v).

Condition 3.4.3 limits opacity discharges from the Prime Coater (ID No. P002), and the Finish Coater (ID No. P003) per Georgia State Rule 391-3-1.02(2)(b).

Condition 3.4.4 restricts the fuel type used in the Thermal Oxidizer (ID No. C001) and Coil Coating Line Curing Oven (ID No. P001) per Georgia State Rule 391-3-1-.03(2)(c).

Existing Condition 3.4.5 restricted particulate matter emissions from the Coil Coating Line Curing Oven (ID No. P001) per Georgia State Rule 391-3-1-.02(2)(d). Georgia State Rule 391-3-1-.01(cc) defines fuel-burning equipment as furnishing process heat indirectly through transfer by fluids or transmissions through process vessel walls. The Coil Coating Line Curing Oven (ID No. P001) is a direct fired unit. Therefore, it does not meet the definition of fuel burning equipment in 391-3-1-.01(cc). Thus, it is not subject to Georgia State Rule 391-3-1-.02(2)(d). Therefore, the condition has been replaced by new Condition 3.4.5.

Existing Condition 3.4.6 limited opacity discharges from the Coil Coating Line Curing Oven (ID No. P001) per Georgia State Rule 391-3-1-.02(2)(d). As stated in the explanation for existing Condition 3.4.5, the Coil Coating Line Curing Oven (ID No. P001) is a direct fired unit. Thus, it is not subject to Georgia State Rule 391-3-1-.02(2)(d). Therefore, the condition has been removed.

New Condition 3.4.5 restricts particulate matter emissions from the Prime Coater (ID No. P002) and the Finish Coater (ID No. P003) per Georgia State Rule 391-3-1-.02(2)(e).

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Condition 4.2.1 requires a performance test to determine the destruction efficiency of the thermal oxidizer.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Condition 5.2.1 requires a continuous monitoring system be installed, calibrated, maintained, and operated to monitor the following:

a. The temperature measured by the thermocouple or temperature sensor located in the combustion chamber of the thermal oxidizer with an accuracy of ±0.75% of the monitored temperature or ±2.5ºC, whichever is greater.

b. The duct velocity in the combined exhaust from the prime coating and finish coating rooms.

C. Compliance Assurance Monitoring (CAM)

Condition 5.2.2 specifies that the Coil Coating Line Curing Oven (ID No. P001), the Prime Coater (ID No. P002), and the Finish Coater (ID No. P003) are subject to CAM requirements for VOC and HAP emissions per 40 CFR Part 64.

Condition 5.2.3 sets procedures for data representativeness, quality assurance, quality control, monitoring frequency, data collection, and averaging periods per CAM requirements of 40 CFR Part 64. This condition has been reworded to specify New Source Performance Standards (NSPS) requirements.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Condition 6.2.1 requires monthly VOC content and calculation records for the Coil Coating Line Curing Oven (ID No. P001), the Prime Coater (ID No. P002), and the Finish Coater (ID No. P003) to be maintained for two years from the date of record per 40 CFR 60 Subpart TT.

Condition 6.2.2 sets the procedure for calculating the overall reduction efficiency R, through use of the VOC fraction F and the control device efficiency E per 40 CFR 60, Subpart TT. Part a of this condition has been modified to define the variable C_b in the volume fraction F equation as the VOC concentration in each gas stream entering the control device to properly calculate mass balance. Part b of this condition has been modified to define variable C_b in the control device efficiency E equation as the VOC concentration in each gas stream entering the control device to properly calculate mass balance as well. The reference for this condition has been modified to 40 CFR 60.463(c)(2)(i).

Condition 6.2.3 requires retention of records for all periods during actual coating operations when the average temperature in the thermal oxidizer remains more than 28ºC (50°F) below the recent destruction efficiency stack test temperature for over 3 hours.

Condition 6.2.4 requires the facility to maintain VOC usage records for the facility wide PSD avoidance limit.

Conditions 6.2.5 and 6.2.6 require the facility to maintain VOC usage records and calculate total VOC emissions from the entire facility on a monthly and 12-month rolling basis. The facility must also provide a report of the totals with the semiannual report and notify the Division of high single month totals.

Condition 6.2.7 requires the facility to maintain HAP usage records for the facility wide MACT avoidance limit. This condition has been modified to include HAP emissions from fuel consumption.

Conditions 6.2.8 and 6.2.9 require the facility to maintain HAP usage records and calculate total HAP emissions from the entire facility on a monthly and 12-month rolling basis. The facility must also provide a report of the totals with the semiannual report and notify the Division of high single month totals.

Condition 6.2.9 has been modified to specify that notification is required when individual HAP emissions equal to or exceed 10 tons per 12-month rolling total and when combined HAP emissions equal to or exceed 25 tons of combined HAP per 12-month rolling total.

Condition 6.2.10 requires the facility to maintain natural gas and propane usage records for the Georgia State Rule 391-3-1-.02(2)(yy) avoidance limit.

Conditions 6.2.11 and 6.2.12 require the facility to maintain the natural gas and propane usage records to calculate NO_x emissions for the entire facility on a monthly and 12-month rolling basis. The facility must also provide a report of the totals with the semiannual report and notify the Division of high single month or 12-month rolling totals.

VII. Specific Requirements

A. Operational Flexibility

None applicable

B. Alternative Requirements

None applicable

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

None applicable

E. Short-Term Activities

None applicable

F. Compliance Schedule/Progress Reports

None applicable

G. Emissions Trading

None applicable

H. Acid Rain Requirements

None applicable

I. Stratospheric Ozone Protection Requirements

None applicable

J. Pollution Prevention

None applicable

K. Specific Conditions

None applicable

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to define the applicability of the Boiler MACT or GACT for major or minor sources of HAP more clearly.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//