

June 17, 2004

Ms. Deborah Jordan
Director, Air Management Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

ALAMEDA COUNTY

Roberta Cooper
Scott Haggerty
(Chairperson)
Nate Miley
Shelia Young

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is issuing a minor revision to the Major Facility Review Permit for USS-POSCO Industries (Facility # A2731).

CONTRA COSTA COUNTY

Mark DeSaulnier
Mark Ross
Gayle Uilkema
(Secretary)

The District proposed a minor permit revision for this facility on March 19, 2004. The following changes were included in the proposed permit.

MARIN COUNTY
Harold C. Brown, Jr.

- Revise permit conditions for one abatement device
- Correct four minor typographical errors
- Raise slightly the minimum temperature to start ammonia flow to an SCR unit
- Added Section X Revision History and revised subsequent section numbers

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY

Willie Brown, Jr.
Chris Daly
Jake McGoldrick

Abatement device A29, Tandem Cold Mill Mist Eliminator, which abates S171, Tandem Cold Mill, erroneously received permit conditions for a wet scrubber, Condition Identification Number 20791. The abatement device is a centrifugal mist eliminator and not a wet scrubber. Since this condition is a common to several sources, the condition now no longer applies to S171 and a new condition has been created. The parts of the permit condition that mention wet scrubber have been changed to reflect a centrifugal mist eliminator and the parts of the condition that mention water flow have been deleted. Additionally, since A29 is downstream of a fan, A29 emits into the atmosphere and there are no valves or dampers downstream of the fan, the inlet pressure to A29 will be measured rather a pressure drop across the device. The revised permit condition is renumbered 21254.

SAN MATEO COUNTY

Jerry Hill
Marland Townsend
(Vice-Chairperson)

SANTA CLARA COUNTY

Erin Garner
Liz Kniss
Patrick Kwok
Julia Miller

SOLANO COUNTY

John F. Silva

SONOMA COUNTY

Tim Smith
Pamela Torliatt

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Four minor errors were corrected. Two Permit Condition Identification Numbers in the Title V permit, Condition Identification Numbers 20790 and 20791, should have been reported as 20780 and 20781, respectively. With A29 now being subject to Condition Identification Number 21254, the general wet scrubber condition, now Condition Identification Number 20781, applies to one less source.

One minor error occurred in Permit Condition Identification Number 7216, Part M2a. Although Part M references "POC Source Testing," Part M2a referred to "HCl." The "HCl" has now been replaced with "POC."

One minor error occurred in Table VII-L, Applicable Limits and Compliance Monitoring Requirements, S171 – Tandem Cold Mill. An organic compound limit cites BAAQMD

Regulation 8-2-301 and applied a limit of 10 lbs/day VOC as C1 while it should have been 15 lbs/day VOC as C1. "10" has now been replaced with "15."

The last revision corrected the minimum temperature to start ammonia flow to A32, Selective Catalytic Reduction (SCR) Unit, which abates the NOx emitted from S174, KM Continuous Annealing Furnace. USS-POSCO incorrectly informed the District that ammonia injection was started when the SCR temperature was 375 degrees Fahrenheit and that temperature was included in Permit Condition Identification Number 7216, Part F3. USS-POSCO informed the District that it incorrectly reported the ammonia injection start temperature and the correct start temperature should be 392 degrees Fahrenheit.

To document the above revisions, we have added Section X Revision History and revised subsequent section numbers.

Enclosed is a copy of the final revised permit. If you have any questions regarding this permit, please call Steve A Hill, Air Quality Engineering Manager, at (415) 749-4673.

Sincerely yours,

Jack P. Broadbent
Executive Officer / APCO

Enclosure
SAH:myl

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