

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b>  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE 1	PAGES 4
	APPL. NO. 503620 Em ICE Admin	DATE 06/08/10
	PROCESSOR MFN	REVIEWER

## PERMIT TO OPERATE ANALYSIS

### FACILITY MAILING ADDRESS

California Steel Industries  
14000 San Bernardino Avenue  
Fontana, California 92335

(ID: 046268      NOx RECLAIM Cycle 1 – Title V)

### EQUIPMENT LOCATION

SAME AS ABOVE

### EQUIPMENT DESCRIPTION

**APPLICATION NO.      503621      -      TITLE V PERMIT REVISION**

**APPLICATION NO.      503620      -      PERMIT TO OPERATE**  
PROCESS 2:      INTERNAL COMBUSTION ENGINES

INTERNAL COMBUSTION ENGINE, D234, EMERGENCY, GENERAC POWER SYSTEMS, INC., RICH BURN, NATURAL GAS FIRED, ELECTRIC POWER GENERATION, MODEL NO. QTA070 WITH A FORD INDUSTRIAL WSG-1068 6.8 LITER ENGINE, NATURALLY ASPIRATED, TEN CYLINDERS, FOUR CYCLE, 110.7 BHP, WITH NON-SELECTIVE CATALYTIC REDUCTION, NETT TECHNOLOGIES, INC.

### BACKGROUND

Application No. 503620 was filed on November 17, 2009, for an Administrative Change of Condition. Application No. 503621 was filed on November 18, 2009, for a RECLAIM facility permit modification.

### **Complaints**

There were no complaints credited to this facility for the past two years.

### **Notices to Comply**

D20255, 11/13/08 to calculate emissions for D140 & D141 using Facility Permit to Operate limit. Ensure electronic reports for Major, Process, and 219

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are submitted on time. Install fuel meters or hour meters for all Rule 219 ICEs and calculate emissions using timer equation.  
Applicant in compliance with all requested requirements, no subsequent compliance action taken.

D03242, 10/07/09 to calculate all emissions from all permitted and non-permitted equipment using accepted methods detailed in the RECLAIM Rules/Protocols.  
Applicant found to be in compliance at subsequent inspection.

D03247, 11/19/09 to demonstrate compliance with Rule 2012, Appendix A, Chapter 2(B) and the attached compliance advisory for all CEMS at the facility.  
Subsequent inspection found applicant in compliance.

### **PROCESS DESCRIPTION**

California Steel Industries, Inc. (CSI) is a steel rolling mill that produces hot rolled, cold rolled, pickled and oiled and galvanized steel products, they also produce electric resistance welded pipe.

This natural gas Emergency Electrical Generator (EEG) is used to power equipment in the Information Services Department (ISD) during power outages and emergencies. The ISD houses important servers and important computers they wish to remain functioning during a power outage.

### **EVALUATION**

During CSI's recent RECLAIM/Title V Audit, the District Inspector noted that the incorrect Serial No. was listed in the Facility Permit for the above mentioned EEG. The serial no. currently listed is for the generator (Generac QTA 070), not for the actual engine (Ford Industrial WSG-1068). This Administrative Change of Condition has been submitted to correct the serial no. in the Facility Permit.

This Administrative Change of Condition does not alter the current emissions credited to this engine. The current emissions will be brought forward from the previous permit as listed in the following table:

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Pollutant	Emission factor, R1 g/bhp-hr	Emission factor, R2 g/bhp-hr	Emission rate lb/hr	Daily emission lb/day	BACT Limit g/bhp-hr	BACT compliance
NOx*	12.35	0.74	0.1804	0.18	1.50	Yes
CO*	6.78	0.95	0.2316	0.23	2.0	Yes
ROG*	0.9	0.18	0.0439	0.04	1.5	Yes
PM <sub>10</sub>	10.0**	10.0	0.0102	0.01	Clean Fuel	Yes
SOx	0.6**	0.6	0.000612	0.00	Clean Fuel	Yes

\* NOx, CO and ROG emission factors based on Nett Technologies' Letter of Compliance dated June 4, 2008

\*\* PM<sub>10</sub> and SOx emission factors are District Default for 4 Stroke, Rich-Burn Engines and in lb/mmcf.

## RULES COMPLIANCE

### **RULE 212** Public Notification

**Paragraph 212 (c)(1)** Requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. According to the website geodistance.com the closest school, Live Oak Elementary School is over 1 mile from California Steel Industries' property line. A 30-Day Public Notice is not required under this paragraph.

**Paragraph 212(c)(2)** The equipment will not result in on-site emission increase exceeding the daily maximums as specified in the table in Rule 212(g). Therefore, a 30-day public notice period will not be required under this paragraph.

**Paragraph 212(c)(3)** Public notice will not be required under this paragraph. See Rule 1401 evaluation section.

**RULE 401** Compliance is expected. Visible emissions are not expected with proper maintenance and operation of this equipment.

**RULE 402** Compliance is expected. Operation of this equipment is not expected to cause a nuisance.

**RULE 404** Engine is in compliance with this rule. Per table 404(a), the allowable PM concentration at 557 scfm is 0.196 gr/scf  

$$PM = \frac{0.0102 \text{ lb/hr} \times 7000 \text{ gr/lb}}{557 \text{ scfm} \times 60 \text{ min/hr}} = 0.002 \text{ gr/scf}$$

**RULE 431.1** Natural gas purchased is required to have a sulfur content less than 16 ppmv. Compliance is expected.

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**RULE 1110.2** Engine is exempt per section (h)(2) of this rule.

**REG XIII** This administrative change of condition does not alter the current emissions for this equipment. This regulation does not apply.

**RULE 1401** Exempt per section (g)(1)(F) of this rule.

**REG XX** NOx emissions are offset by CSI's available NOx RTC's

**REG XXX** This is a minor permit revision. EPA 45-day review is required.

**RECOMMENDATION**

Issue Permit to Operate as described in this report and facility permit after the end of the 45-day EPA review period.