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**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY**
**AIR QUALITY DIVISION**

**MEMORANDUM** **November 4, 2024**

**TO:** Phillip Fielder, P.E., Chief Engineer

**THROUGH:** Rick Groshong, Sr. Manager, Compliance, Enforcement, and Surveillance

**THROUGH:** Eric L. Milligan, P.E., Engineering Manager, Engineering Section

**THROUGH:** Alex Johnson, E.I., New Source Permits Section

**FROM:** Joseph K. Wills, P.E., Engineering Section

**SUBJECT:** Evaluation of Permit Application No. **2021-0438-TV**
Company: Webco Industries, Inc.
Facility: Webco Industries Star Center Tube
Facility ID: 7898
Latitude: 36.12910°N; Longitude: 96.14725°W
Section 16, Township 16N, Range 11E, Tulsa County, Oklahoma
Address: 13701 W Highway 51, Sand Springs, Oklahoma 74063

## SECTION I. INTRODUCTION

Webco Industries, Inc. (Webco) has applied for an initial Part 70 operating permit for their Star Center Tube (SCT) facility. The facility is currently operating under Permit No. 2021-0438-C PSD, issued on June 11, 2024, and Permit No. 2011-0289-O, issued on April 25, 2012, an Authorization to Operate under the General Permit for Area Source NESHAP Facilities and Small NSPS Facilities (GP-ASNF/SNF). Since the facility emits more than 100 TPY of a regulated pollutant, it is subject to Title V permitting requirements.

The facility is classified as steel pipe and tube manufacturing facility (NAICS 331210 / SIC 3317). The facility is a major source for Prevention of Significant Deterioration (PSD) and a minor source of Hazardous Air Pollutants (HAPs). Since the construction permit was processed through the "traditional NSR process," this Title V permit requires a 30-day public review opportunity and a separate 45-day EPA review opportunity.

## SECTION II. PERMIT HISTORY

| Permit | Date Issued | Description |
|---|---|---|
| 2011-289-NOI | 5/27/2011 | Initial minor source construction permit for the facility. |
| 2011-289-O | 4/25/2012 | Initial minor source operating permit for the facility. |

| Permit | Date Issued | Description |
|---|---|---|
| 2021-0438-C PSD | 6/11/2024 | Major source PSD construction permit submitted as a result of a self-disclosure and Enforcement Case No. 10046 in which the facility was identified as a potential PSD major source for CO. Modeling was conducted and BACT limits were applied to DX Generator GEN1. |
| 2021-0438-C (M-1) | Currently under review | Minor modification construction permit to authorize the installation of a new engine and the installation of new DX Generator inlet air and inlet gas flow sensors. |

## SECTION III. REQUESTED CHANGES

- Permit No. 2021-0438-C PSD required testing of CO for the DX Generator at least once every 24 months following the guidelines established in AQD's 2011 Periodic Testing Standardization guidance. The guidance requires testing at least every other year for sources which have permitted emissions between 250 TPY and 500 TPY; however, the guidance only requires testing once every five (5) year or at least once during the permit term for sources where permitted emissions are greater than 100 TPY but less than 250 TPY. The DX Generator has potential CO emissions of 218.91 TPY. Therefore, this permit requires testing of CO from the DX Generator once every 5 years, consistent with the AQD's 2011 Periodic Testing Standardization guidance.
- Added the allowance for compliance with OAC 252:100-37-25(c) in the specific conditions and corresponding recordkeeping requirements.
- Added the allowance for compliance with OAC 252:100-39-46(h) in the specific conditions and corresponding recordkeeping requirements.
- Added insignificant activities to the Memorandum and applicable requirements in the specific conditions.

## SECTION IV. FACILITY DESCRIPTION

Webco's Star Center Tube is a seam-welded carbon steel tubing manufacturing facility. Production activities at the site include raw material receiving and handling, steel tubing surface preparation, ERW welding of slit and formed sheet coil into tubing, heat annealing of steel tubes, finishing and cold drawing of steel tubes, and shipping of finished product. In addition to these fundamental processing steps, ancillary operations include space heating, parts cleaning, and emergency generators used in the event of loss of electrical power. Surface preparation, which includes grinding (deburring) of tube ends, was evaluated to be minimal and have negligible quantities of emissions. Therefore, surface preparation activities will not be addressed further.

The gas-fired roller hearth furnace is the heart of site operations. The furnace's function is to heat-treat various grades and diameters of carbon steel tubing. There are various lengths and configurations of tube annealed in the furnace. To meet market demands, Webco must produce tubing with exceptional surface quality. Although the quality demands of the products vary, all products must meet strict surface quality specifications. The annealing process is used for

improving mechanical or electrical properties of the metal, and can result in increased product stability, better ductility, relieving stress, and refined grain size.

To achieve acceptable surface quality and specifications of Webco's steel tubing, Webco must employ unique and specialized processing techniques. In particular, the furnace must be operated within a specific set of conditions that carefully control combustion to produce heat for the selected treatment process. As such, the design and engineering of the equipment that produces an acceptable atmosphere to achieve the required product quality is key. Webco's furnace design incorporates a DX Generator, which produces an exothermic gas used to create an oxygen-free atmosphere necessary for product quality. This gas is also rich in carbon monoxide. The oxygen-free atmosphere allows Webco to control the amount and type of oxidation occurring on the product surface during the annealing process and on the furnace rollers during idling conditions.

The DX Generator produces an oxygen-free atmosphere through combustion of air and natural gas and is equipped with controls to operate at various air-fuel ratios. By altering the air-fuel ratio, the DX Generator makes it possible to create various internal atmosphere conditions or "processes" in the furnace. Webco primarily operates under four different conditions. Conditions in the furnace reflect the various processes, and in general can be described as:

- Rich 7:1 air to fuel ratio at high temperature (Rich 7:1 HT)
- Rich 7:1 air to fuel ratio at low temperature (Rich 7:1 LT)
- Lean 9:1 air to fuel ratio at high temperature (Lean 9:1 HT)
- Lean 9:1 air to fuel ratio at low temperature (Lean 9:1 LT)

Cycle times also vary, depending on product material steel grade, dimensions, and customer quality expectations. All of the processes are important to Webco's operations, and all processes regularly occur at multiple times over the course of an operating year.

During all processes, the furnace provides indirect heating of the furnace and the combustion products from the heater exhaust directly to the inside of the building (i.e., not through the furnace) and exits the building though the general building ventilation systems, while the DX Generator process gas is routed to the furnace and exhausts through both the furnace entrance and the furnace exit locations. Flame curtains are in place at the furnace entrance and exit locations. The flame curtains are operated for both the rich and lean atmospheric processes. After the flame curtains, the emissions from the furnace inlets and outlets are directed to collection hoods where the emissions and are directed outside the building to the atmosphere. While the DX Generator normally vents its produced gas directly to the furnace, a bypass stack for each DX Generator exists that vents the feed gas outside of the building to the atmosphere in the following circumstances: 1) during emergency conditions; 2) when the DX Generators and furnaces are shut down and started up for maintenance; and 3) when purging the atmosphere in the furnaces when switching to a new atmospheric process. During purging of the atmosphere in the furnace when switching to a new atmospheric process, the bypass venting will only occur when switching from a lean atmosphere in the associated furnace to a "rich" atmosphere (i.e., bypass venting of "lean" exothermic gas). Bypass venting of "rich" exothermic gas is not required when switching from a "rich" atmosphere to a "lean" atmosphere in the furnace.

## SECTION V. EQUIPMENT

### A. EUG 1: Furnace and Heaters

| EU ID# | Point ID# | EU Description | Design Capacity | Construction Date |
|---|---|---|---|---|
| FURN1 | FURN1 | Furnace 141 | 22.5 MMBtu/hr | 12/2011 |
| BOIL1 | BOIL1 | Burnham Boiler | 12.6 MMBtu/hr | 12/2011 |
| DRY1 | DRY1 | Tube Dryer 1 | 1.3 MMBtu/hr | 04/2012 |
| DRY2 | DRY2 | Tube Dryer 2 | 1.3 MMBtu/hr | 04/2012 |
| AMU1 | AMU1 | Air Make Up Unit 1 | 5.635 MMBtu/hr | 07/2019 |
| AMU2 | AMU2 | Air Make Up Unit 2 | 5.635 MMBtu/hr | 07/2019 |
| AMU3 | AMU3 | Air Make Up Unit 3 | 5.635 MMBtu/hr | 07/2019 |

### B. EUG 2: DX Generator and Flame Curtains

| EU ID# | Point ID# | EU Description | Design Capacity [(1)] | Construction Date |
|---|---|---|---|---|
| GEN1 | FC1 & FC2 / GEN1 Bypass | DX Generator 141 | 3.80 MMBtu/hr | Post-2009 |
| FC1 & FC2 | FC1 & FC2 | 141 Flame Curtains | 0.04 MMBtu/hr (each) | Post-2009 |

### C. EUG 3: Emergency Generators

| EU ID# | Point ID# | EU Description | Design Capacity | Serial Number | Construction Date |
|---|---|---|---|---|---|
| GEN2 | GEN2 | Generac SG035 Emergency Generator | 76-hp | 2112573 | Post-2009 |
| GEN3 | GEN3 | Generac QT080 Emergency Generator | 133-hp | 6581448 | Post-2009 |
| GEN4 | GEN4 | Generac QT150 Emergency Generator | 231-hp | 6561991 | Post-2009 |
| GEN5 | GEN5 | Generac QT150 Emergency Generator | 231-hp | 6561992 | Post-2009 |
| GEN6 | GEN6 | Generac SG050 Emergency Generator | 86-hp | 3001274232 | Post-2009 |

### D. EUG 4: Coatings

| EU ID# | Point ID# | EU Description | Design Capacity | Construction Date |
|---|---|---|---|---|
| COAT1 | COAT1 | Coating Operations | N/A | -- |

### E. EUG 5: Tanks

| EU ID# | Point ID# | EU Description | Design Capacity | Construction (Replacement) Date |
|---|---|---|---|---|
| TK-GAS | TK-GAS | Gasoline Tank | 300-gallons | 02/2012 |

### F. EUG 6: Parts Washers

| EU ID# | Point ID# | EU Description |
|---|---|---|
| WASH | WASH | Parts Washers |

### G. EUG 7: Pickling

| EU ID# | Point ID# | EU Description | Design Capacity | Construction (Replacement) Date |
|---|---|---|---|---|
| TANK1 | TANK1 | Steel Pickling Tank (Sulfuric Acid) | 1,568 $ft^3$ | 04/2012 |

### H. EUG 8: Cooling Towers

| EU ID# | Point ID# | EU Description | Design Capacity | Construction (Replacement) Date |
|---|---|---|---|---|
| CT1 | CT1 | Cooling Tower | 2,200 gpm | 6/1/2012 |

### I. EUG 9: Space Heaters

| EU ID# | Point ID# | EU Description | Design Capacity | Construction Date |
|---|---|---|---|---|
| HEAT1 | HEAT1 | Space Heaters | 16.7 MMBtu/hr [(1)] | Various |

[(1)] Value shown is the sum of various space heaters of different rated design capacities throughput the facility. The lowest rated design capacity is 0.10 MMBtu/hr. The highest rated design capacity is 0.20 MMBtu/hr.

### J. EUG 10: Welding

| EU ID# | Point ID# | EU Description | Construction Date |
|---|---|---|---|
| WELD1 | WELD1 | Welding Activities | -- |

## SECTION VI. EMISSIONS

Unless otherwise stated, emissions are based on 8,760 hours per year of operation.

## A. EUG 1: Furnace and Heaters

NOX and CO emissions form the Air Makeup Units are based on manufacturer provided data. All other emissions from the natural gas-fired burners of the annealing furnace, Burnham boiler, tube dryers, and air make up units are based on AP-42 (7/98), Section 1.4 emission factors shown in the following table, a natural gas heating value of 1,020 Btu/scf, and the ratings in the following second table. Emissions from $SO_2$ were estimated to have negligible emissions.

**Furnace and Heater Emission Factors**

| Source | $NO_X$ | CO | VOC | $PM_{10/2.5}$ |
|---|---|---|---|---|
| | lb/MMscf | lb/MMscf | lb/MMscf | lb/MMscf |
| AP-42, Section 1.4 | 100.0 | 84.0 | 5.5 | 7.6 |
| AMU Manufacturer Data | 34.8 | 291.4 | -- | -- |

**Furnace and Heater Emissions**

| ID# | Rating | $NO_X$ | | CO | | VOC | | $PM_{10/2.5}$ | |
|---|---|---|---|---|---|---|---|---|---|
| | MMBtu/hr | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY |
| FURN1 | 22.5 | 2.21 | 9.66 | 1.85 | 8.12 | 0.12 | 0.53 | 0.17 | 0.73 |
| BOIL1 | 12.6 | 1.24 | 5.41 | 1.04 | 4.55 | 0.07 | 0.30 | 0.09 | 0.41 |
| DRY1 | 1.3 | 0.13 | 0.56 | 0.11 | 0.47 | 0.01 | 0.03 | 0.01 | 0.04 |
| DRY2 | 1.3 | 0.13 | 0.56 | 0.11 | 0.47 | 0.01 | 0.03 | 0.01 | 0.04 |
| AMU1 | 5.635 | 0.19 | 0.84 | 1.61 | 7.05 | 0.03 | 0.13 | 0.04 | 0.18 |
| AMU2 | 5.635 | 0.19 | 0.84 | 1.61 | 7.05 | 0.03 | 0.13 | 0.04 | 0.18 |
| AMU3 | 5.635 | 0.19 | 0.84 | 1.61 | 7.05 | 0.03 | 0.13 | 0.04 | 0.18 |

## B. EUG 2: DX Generator and Flame Curtains

CO emissions from the DX Generator are based on stack testing conducted by Webco between February 8th, and February 12th of 2021, and an applied 25% safety factor. The testing was conducted the captured emissions (after control from the flame curtains) from the collection hoods installed at the inlet and outlet of the annealing furnace and the downdraft system. The downdraft system has since been removed and the applicant expects actual emission will be lower. Emissions from the bypass operations are based on stack testing of a similar unit from Webco's Southwest Tube facility with an added 25% safety factor. These emissions do not include emissions not collected by the inlet and outlet hoods. The emission rates established below will be verified through formal EPA Reference Method stack testing requirements established in the specific conditions.

**CO Emissions from DX Generator GEN1**

| Operating Mode | Emission Factors | Hours of Operation (1) | Emissions |
|---|---|---|---|
| | lb/hr | hr/yr | TPY |
| Rich (7:1 HT) | 45.0 | 665 | 14.96 |
| Lean (9:1 HT) | 49.3 | 8,000 | 197.20 |
| Rich (7:1 LT) | 27.4 | 0 | 0.00 |
| Lean (9:1 LT) | 32.7 | 0 | 0.00 |

| Operating Mode | Emission Factors | Hours of Operation (1) | Emissions |
|---|---|---|---|
| | lb/hr | hr/yr | TPY |
| Bypass (2) | 142.0 | 95 | 6.75 |
| **Totals** | | **8,760** | **218.91** |

(1) Based on historic operating records.

(2) Bypass emissions are emitted from the bypass vent during purging of the atmosphere in the furnace before switching between operating modes. Bypass event emissions were extrapolated to represent a potential full hour event.

$NO_X$, VOC, and $PM_{10/2.5}$ emissions from the combustion of natural gas in the DX Generator to produce the exothermic gas which is supplied to the furnace and $NO_X$, CO, VOC, and $PM_{10/2.5}$ emissions from the combustion of natural gas from the flame curtains are based on AP-42 (7/98), Section 1.4 emission factors shown in the following table, a natural gas heating value of 1,020 Btu/scf, and the ratings shown in the following second table. The DX Generator and flame curtains were estimated to have negligible $SO_2$ emissions.

**Combustion Emission Factors**

| $NO_X$ | CO (1) | VOC | $PM_{10/2.5}$ |
|---|---|---|---|
| lb/MMscf | lb/MMscf | lb/MMscf | lb/MMscf |
| 100.0 | 84.0 | 5.5 | 7.6 |

(1) The CO emission factor was not used to calculate the CO emissions generated by GEN1.

**DX Generator and Flame Curtain Emissions**

| ID# | Rating | $NO_X$ | | CO | | VOC | | $PM_{10/2.5}$ | |
|---|---|---|---|---|---|---|---|---|---|
| | MMBtu/hr | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY |
| GEN1 | 3.80 | 0.37 | 1.63 | 49.30 (1) | 218.91 (2) | 0.02 | 0.09 | 0.03 | 0.12 |
| FC1 | 0.04 | <0.01 | 0.02 | <0.01 | 0.02 | <0.01 | <0.01 | <0.01 | <0.01 |
| FC2 | 0.04 | <0.01 | 0.02 | <0.01 | 0.02 | <0.01 | <0.01 | <0.01 | <0.01 |

(1) Emissions are calculated based on worst case hourly emission rates from February 2021 testing for normal operations as discussed previously.

(2) Emissions are calculated based on hourly emission rates from February 2021 testing and historic operations as discussed previously.

## C. EUG 3: Emergency Generators

Emissions of $NO_X$, and VOC from the natural gas-fired emergency generator engine are based on manufacturer data. Emissions of CO, $PM_{10/2.5}$, $SO_2$, and $H_2CO$ are based on the highest AP-42 (7/00), Section 3.2 emission factors (i.e., Table 3.2-1 for two-stroke, lean-burn engines). $SO_2$ emissions from the engines were estimated to be negligible.

**Emergency Generator Emissions**

| EU ID | Rated Power | Brake Specific Heat | Pollutant | Emission Factors | Emissions | |
|---|---|---|---|---|---|---|
| | hp | Btu/hp-hr | | | lb/hr | TPY (1) |
| GEN2 | 76 | 7,592.1 | $NO_X$ | 10.00 g/hp-hr | 1.68 | 0.42 |
| | | | CO | 0.3860 lb/MMBtu | 0.22 | 0.06 |
| | | | VOC | 1.60 g/hp-hr | 0.27 | 0.07 |
| | | | $PM_{10/2.5}$ | 0.0483 lb/MMBtu | 0.03 | 0.01 |
| | | | $H_2CO$ | 0.0552 lb/MMBtu | 0.03 | 0.01 |
| GEN3 | 133 | 9,415 | $NO_X$ | 10.00 g/hp-hr | 2.93 | 0.73 |
| | | | CO | 0.3860 lb/MMBtu | 0.48 | 0.12 |
| | | | VOC | 1.39 g/hp-hr | 0.41 | 0.10 |
| | | | $PM_{10/2.5}$ | 0.0483 lb/MMBtu | 0.06 | 0.01 |
| | | | $H_2CO$ | 0.0552 lb/MMBtu | 0.07 | 0.02 |
| GEN4 | 231 | 8,922 | $NO_X$ | 2.00 g/hp-hr | 1.02 | 0.26 |
| | | | CO | 0.3860 lb/MMBtu | 0.80 | 0.20 |
| | | | VOC | 1.00 g/hp-hr | 0.51 | 0.13 |
| | | | $PM_{10/2.5}$ | 0.0483 lb/MMBtu | 0.10 | 0.03 |
| | | | $H_2CO$ | 0.0552 lb/MMBtu | 0.11 | 0.03 |
| GEN5 | 231 | 8,922 | $NO_X$ | 2.00 g/hp-hr | 1.02 | 0.26 |
| | | | CO | 0.3860 lb/MMBtu | 0.80 | 0.20 |
| | | | VOC | 1.00 g/hp-hr | 0.51 | 0.13 |
| | | | $PM_{10/2.5}$ | 0.0483 lb/MMBtu | 0.10 | 0.03 |
| | | | $H_2CO$ | 0.0552 lb/MMBtu | 0.11 | 0.03 |
| GEN6 | 86 | 10,263 | $NO_X$ | 2.52 g/hp-hr | 0.48 | 0.12 |
| | | | CO | 0.3860 lb/MMBtu | 0.34 | 0.09 |
| | | | VOC | 1.60 g/hp-hr | 0.30 | 0.08 |
| | | | $PM_{10/2.5}$ | 0.0483 lb/MMBtu | 0.04 | 0.01 |
| | | | $H_2CO$ | 0.0552 lb/MMBtu | 0.05 | 0.01 |

(1) Based on a maximum of 500 hours of operation per year.

## D. EUG 4: Coatings

Coating operations include cleaning solvents, lubrications, corrosion inhibitors, coolants, paint, and inks. Emissions from coating operations are based on mass balance using the material properties from the SDS of each coating and the maximum historical coating usage from historical usage with an applied safety factor of 2.5.

Transfer efficiencies used for calculating particulate matter emissions is based on those listed in AP-42 (1/95), Section 4.2.2.4. Additionally, DEQ guidance document "Permit Application Guide for Facilities with Coating/Painting Operations" (12/28/2011) states, "[f]or dip coating, roll coating, or similar operations (other than spraying), emissions of solid components will be minimal…" However, a transfer efficiency of 99% was used for a conservative emissions estimate. VOC emissions from OAC 252:100-37-25 coatings were calculated using a transfer efficiency of 0%, where other materials were calculated using a transfer efficiency of 99%. VOC emissions calculations assume that all VOC are emitted.

The following tables identify each material used, historical usage, material properties, and calculated emissions from each material. The first table lists individual coatings which are potentially subject to OAC 252:100-37-25 and 26 such as paints, inks, etc., and include cleaning solutions which are used for the purpose of makeup, thinning, or cleanup of coatings. The second table represents other materials which are used as short-term corrosion preventatives, coolants, lubricants, etc. It should be noted that the product information presented below is only for that of the individual materials and does not represent "as applied" information.

**OAC 252:100-37-25 & 26 Coating Properties and Emissions**

| Coating | Product Usage | Product Density | Product VOC | Product Solids | Solids Transf. Eff. | VOC Emissions | $PM_{10}$ / $PM_{2.5}$ Emissions |
|---|---|---|---|---|---|---|---|
| | gal/yr | lb/gal | wt. % | wt. % | % | TPY | TPY |
| Carco Paint Fluorescent Orange MM-150 | 5.00 | 7.98 | 75% | 25% | 25% | 0.01 | <0.01 |
| Carco Paint Fluorescent Pink FL-1644 | 85.00 | 6.76 | 100% | 0% | 25% | 0.29 | 0.00 |
| Carco Paint Lime Green FL-1644 | 64.38 | 6.76 | 100% | 0% | 25% | 0.22 | 0.00 |
| Domino Make-up Fluid | 322.50 | 6.68 | 100% | 0% | 25% | 1.08 | 0.00 |
| Domino Wash Solution | 36.56 | 6.68 | 100% | 0% | 25% | 0.12 | 0.00 |
| Domino White Ink | 29.44 | 6.93 | 100% | 0% | 25% | 0.10 | 0.00 |
| Domino White Ink Reservoir | 19.69 | 7.76 | 100% | 0% | 25% | 0.08 | 0.00 |
| Krylon Bright Gold | 2.46 | 6.26 | 100% | 0% | 25% | 0.01 | 0.00 |
| Paint and Primer Gold | 2.48 | 6.34 | 100% | 0% | 25% | 0.01 | 0.00 |
| Paint Cherry Red | 19.68 | 6.34 | 100% | 0% | 25% | 0.06 | 0.00 |
| Paint Dusty Pink | 6.25 | 6.58 | 13% | 88% | 25% | <0.01 | 0.01 |
| Paint Fluorescent Pink | 1.76 | 7.21 | 100% | 0% | 25% | 0.01 | 0.00 |
| Paint Forrest Green | 47.50 | 6.18 | 18% | 82% | 25% | 0.03 | 0.09 |
| Paint Gloss White | 21.56 | 6.43 | 100% | 0% | 25% | 0.07 | 0.00 |
| Paint Light Blue | 36.88 | 6.94 | 100% | 0% | 25% | 0.13 | 0.00 |
| Paint Orange | 17.58 | 6.73 | 100% | 0% | 25% | 0.06 | 0.00 |
| Paint Regal Blue | 37.25 | 6.31 | 100% | 0% | 25% | 0.12 | 0.00 |
| Paint Safety Yellow | 136.25 | 6.18 | 100% | 0% | 25% | 0.42 | 0.00 |
| Paint Sun Yellow | 1.76 | 6.34 | 100% | 0% | 25% | 0.01 | 0.00 |
| SW Gentian Blue | 10.00 | 10.60 | 100% | 0% | 25% | 0.05 | 0.00 |
| SW Safety Yellow | 37.50 | 9.10 | 4% | 96% | 25% | 0.01 | 0.12 |
| Multipurpose Solvent | 550.00 | 5.71 | 100% | 0% | 0% | 1.57 | 0.00 |
| MEK | 1,100.00 | 6.72 | 100% | 0% | 0% | 3.70 | 0.00 |
| **Totals** | | | | | | **8.14** | **0.23** |

**Other Materials Properties and Emissions**

| Material | Product Usage | Product Density | Product VOC | Product Solids | Solids Transf. Eff. | VOC Emissions | $PM_{10}$ / $PM_{2.5}$ Emissions |
|---|---|---|---|---|---|---|---|
| | gal/yr | lb/gal | wt. % | wt. % | % | TPY | TPY |
| Additive 16P | 928.00 | 9.76 | 30% | 70% | 99% | 0.01 | 0.03 |
| Ferrocote 118EC | 4,950.00 | 7.61 | 17% | 83% | 60% | 0.03 | 6.25 |
| Perkote 10-385 | 1,031.25 | 8.66 | 65% | 35% | 80% | 0.03 | 0.31 |
| Perkote 10-985 | 10,725.00 | 7.26 | 51% | 49% | 80% | 0.20 | 3.82 |
| Phos Dip 47 Additive | 2,475.00 | 12.10 | 2% | 99% | 99% | <0.01 | 0.15 |

| Material | Product Usage | Product Density | Product VOC | Product Solids | Solids Transf. Eff. | VOC Emissions | $PM_{10}$ / $PM_{2.5}$ Emissions |
|---|---|---|---|---|---|---|---|
| | gal/yr | lb/gal | wt. % | wt. % | % | TPY | TPY |
| Phos Dip 47 Make-Up | 14,850.00 | 13.44 | 3% | 98% | 99% | 0.03 | 0.97 |
| Phos Dip 47 Replenisher | 85,387.50 | 13.44 | 0% | 100% | 99% | 0.00 | 5.74 |
| Syntillo | 11,081.25 | 8.35 | 29% | 71% | 99% | 0.13 | 0.33 |
| Royal 52 | 687.50 | 7.68 | 1% | 99% | 25% | <0.01 | 1.96 |
| Intricut 197 | 137.50 | 7.68 | 1% | 99% | 25% | <0.01 | 0.39 |
| Mineral Spirits (Solvent) | 4,950.00 | 6.76 | 100% | 0% | 25% | 16.73 | 0.00 |
| **Totals** | | | | | | **17.17** | **19.96** |

Webco has requested a facility-wide VOC emissions limit of 90 TPY and includes emissions from coating operations and the parts washers (as discussed in Section VI.F).

## E. EUG 5: Tanks

Working and breathing emissions from the gasoline storage tank were calculated using AP-42 (6/20), Section 7.1, the properties of the liquid stored, and the listed annualized throughput in the following table.

**Tank Emissions**

| Parameter | TK-GAS |
|---|---|
| Throughput, gal/yr | 3,998 |
| Liquid in Tank(s) | Gasoline (RVP 13) |
| Working/Breathing Method/Tool | AP-42 (06/20), Section 7.1 |
| Flash Calculation Method/Tool | N/A |
| Working/Breathing Emissions, TPY | 0.15 |
| Flashing Emissions, TPY | N/A |
| Control Type | None |
| **VOC Emissions, TPY** | 0.15 |

HAP emissions from the tanks were evaluated and determined to be negligible.

## F. EUG 6: Parts Washers

Emissions from the parts washers are based on mass balance using the material properties from the SDS of mineral spirits as a worst-case surrogate for cleaning solvents and the maximum historical solvent throughput for the facility. The parts washers are not used for the purpose of cleanup of coatings that are subject to the requirements of OAC 252:100-37-25(a) or OAC 252:100-39-46(d). The throughput listed in the following table was determined by subtracting the amount of solvent recovered from the amount used.

**Parts Washer Emissions**

| Material | Throughput | Density | VOC Content | Control Efficiency | VOC |
|---|---|---|---|---|---|
| | gal/yr | lb/gal | wt % | % | TPY |
| Cleaning Solvent | 100 | 6.76 | 100 | 0 | 0.34 |

Webco has requested a facility-wide VOC emissions of 90.0 TPY which includes emissions from coating operations (as discussed in Section VI.D) and the parts washers.

## G. EUG 7: Pickling

Sulfuric acid mist emissions from the pickling tanks were calculated using the Estimation of Losses from Open Tanks Containing Sulfuric Acid" worksheet prepared by Esco Engineering, Esco Engineering (1998), "Emissions from Open Tanks." http://pas.mnsi.net/, which is intended for emission calculations for open sulfuric acid tanks with lateral exhaust. The calculation methodology assumes sulfuric acid emissions are a result of mechanical losses and drips of acid off the material as it is lifted out of the tank. These include aerosols formed by bursting of hydrogen bubbles at the surface (the most significant source of emissions), air agitation, and disturbance of the surface by movement of the material being pickled, as the vapor of sulfuric acid at pickling temperatures and concentrations is negligible. The maximum process rate of the pickling tanks is based on a maximum crane weight capacity of 15 tons and a minimum pickling tank cycle time of 20 minutes. A foaming inhibitor is used in the operation, which also reduces $H_2SO_4$ emissions. The following table shows the inputs and resulting emissions from the worksheet.

**Pickling Tank $H_2SO_4$ Emissions**

| Parameter | Value | Units |
|---|---|---|
| Inputs: | | |
| Acid in tank liquid | 12.5 | gal of acid per 100 gal of solution |
| Iron in tank liquid | 6.5 | gal of iron per 100 gal of solution |
| Tank freeboard, inches | 16 | inches |
| Steel pickled, tons/hr | 11.16 | tons per hour |
| Fume exhaust rate, cfm | 15,339 | cfm |
| Inhibition (1) | 83 (2) | % |
| Total operation, hours | 8,760 | hrs. |
| Foaming inhibitor? | Y | |
| Plastic Ball Layers | N | |
| Intermediate Results | | |
| Overall correction factor | 7.30E+03 | |
| Hydrogen generated | 1.92E+03 | acfh |
| Liquid entrained | 4.96E-02 | Ipm |
| Free acid in air | 6.20E+03 | mg/m |
| Iron in air | 3.23E+03 | mg/m |
| Combined acid in air | 5.65E+03 | mg/m |
| Total acid in air | 1.18E+04 | mg/m |
| Total volume of air | 4.35E+02 | $m^3/m$ |

| Parameter | Value | Units |
|---|---|---|
| Results: | | |
| Free acid in exhaust air | 14.3 | $mg/m^3$ |
| Iron in exhaust air | 7.4 | $mg/m^3$ |
| Combined acid in exhaust | 13.0 | $mg/m^3$ |
| Total acid in exhaust | 27.3 | $mg/m^3$ |
| | 1.57 lb/hr | lb/hr |
| | **6.86** | **TPY** |

(1) Recommended default value of 90%.
(2) Inhibition listed accounts for periods of downtime for maintenance.

## H. EUG 8: Cooling Towers

Particulate emissions from cooling towers were estimated based on the calculation methodology and water droplet size distribution for high efficiency drift eliminators from, Reisman, Joel and Gordon Frisbie. "Calculating Realistic $PM_{10}$ Emissions from Cooling Towers." *Environmental Progress* 21 (2002): 127-130. A sample calculation and emissions summary table are presented as follows.

Annual drift

$$\frac{2{,}200\ gal\ water}{1\ min} \times \frac{8.34\ lb}{1\ gal\ water} \times \frac{60\ min}{1\ hr} \times 0.005\%\ drift\ = \frac{55.04\ lb\ drift}{1\ hr}$$

Particulate emissions

$$\frac{55.04\ lb\ drift}{1\ hr} \times \frac{980\ lb\ TDS}{10^6\ lb\ water} \times 99.1\%\ PM_{30} \times \frac{8{,}760\ hrs}{1\ year} \times \frac{1\ ton}{2{,}000\ lbs} = 0.091\ TPY\ PM_{30}$$

**Cooling Tower Parameters and Emissions**

| Parameter | CT1 |
|---|---|
| Water circulation rate, gpm | 2,200 |
| TDS concentration, ppmw (1) | 980 |
| TDS density, g/cc (2) | 2.5 |
| Drift loss, % | 0.005 |
| Calculated drift rate, lb/hr | 55.04 |
| $PM_{30}$ distribution, % | 99.1 |
| $PM_{10}$ distribution, % | 88.0 |
| $PM_{2.5}$ distribution, % | 0.05 |
| PM emissions, TPY | 0.23 |
| $PM_{10}$ emissions, TPY | 0.21 |
| $PM_{2.5}$ emissions, TPY | <0.01 |

(1) Estimated TDS concentrations.
(2) Average density of common salts ($CaCO_3$, $CaSO_4$, $CaCl_2$, NaCl, $Na_2SO_4$, $Na_2CO_3$).

## I. EUG 9: Space Heaters

Emissions from the space heaters are based on AP-42 (7/98), Section 1.4 emission factors shown in the following table, a natural gas heating value of 1,020 Btu/scf, and the ratings shown in the following second table. Emissions of $SO_2$ were estimated to be negligible.

**Space Heater Emission Factors**

| $NO_X$ | CO | VOC | $PM_{10/2.5}$ |
|---|---|---|---|
| lb/MMscf | lb/MMscf | lb/MMscf | lb/MMscf |
| 100.0 | 84.0 | 5.5 | 7.6 |

**Space Heater Emissions**

| ID# | Rating | $NO_X$ | | CO | | VOC | | $PM_{10/2.5}$ | |
|---|---|---|---|---|---|---|---|---|---|
| | MMBtu/hr | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY |
| HEAT1 | 16.7 | 1.64 | 7.17 | 1.38 | 6.02 | 0.09 | 0.39 | 0.12 | 0.55 |

## J. EUG 10: Welding

Welding emissions are calculated based on material usage from the most recent calendar year, welding process types used at the facility, emission factors from AP-42 (1/95), Section 12.19 shown in the following table, and assuming similar electrode types to that used at the facility.

**Welding Emission Factors [(1)]**

| Welding Process | Electrode Type | lb Used | $PM_{10}$ | Cr | Cr (VI) | Co | Mn | Ni | Pb |
|---|---|---|---|---|---|---|---|---|---|
| | | lbs/yr | $lb/10^3$ lb | | | | | | |
| SMAW | E7018 | 200 | 18.4 | 0.06 | ND | <0.01 | 10.3 | 0.02 | ND |
| SMAW | E6010 | 50 | 25.6 | 0.03 | 0.01 | ND | 9.91 | 0.04 | ND |
| GMAW | ER70S[(2)] | 24 | 5.2 | 0.01 | ND | <0.01 | 3.18 | 0.01 | ND |

(1) ND = Nondetectable.
(2) Based on electrode type E70S.

**Welding Emissions**

| Welding Process | Electrode Type | $PM_{10}$ | Cr | Cr (VI) | Co | Mn | Ni | Pb |
|---|---|---|---|---|---|---|---|---|
| | | TPY | | | | | | |
| SMAW | E7018 | 3.68 | 0.01 | <0.01 | <0.01 | 2.06 | <0.01 | <0.01 |
| SMAW | E6010 | 1.28 | <0.01 | <0.01 | <0.01 | 0.50 | <0.01 | <0.01 |
| GMAW | ER70S | 0.12 | <0.01 | <0.01 | <0.01 | 0.08 | <0.01 | <0.01 |
| **Totals** | | **5.08** | **0.01** | **<0.01** | **<0.01** | **2.64** | **<0.01** | **<0.01** |

## K. Facility-Wide Emissions

| EU ID | $NO_X$ | | CO | | VOC | | $PM_{10}$ | | $PM_{2.5}$ | |
|---|---|---|---|---|---|---|---|---|---|---|
| | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY |
| FURN1 | 2.21 | 9.66 | 1.85 | 8.12 | 0.12 | 0.53 | 0.17 | 0.73 | 0.17 | 0.73 |
| BOIL1 | 1.24 | 5.41 | 1.04 | 4.55 | 0.07 | 0.30 | 0.09 | 0.41 | 0.09 | 0.41 |

| EU ID | $NO_X$ | | CO | | VOC | | $PM_{10}$ | | $PM_{2.5}$ | |
|---|---|---|---|---|---|---|---|---|---|---|
| | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY | lb/hr | TPY |
| DRY1 | 0.13 | 0.56 | 0.11 | 0.47 | 0.01 | 0.03 | 0.01 | 0.04 | 0.01 | 0.04 |
| DRY2 | 0.13 | 0.56 | 0.11 | 0.47 | 0.01 | 0.03 | 0.01 | 0.04 | 0.01 | 0.04 |
| AMU1 | 0.19 | 0.84 | 1.61 | 7.05 | 0.03 | 0.13 | 0.04 | 0.18 | 0.04 | 0.18 |
| AMU2 | 0.19 | 0.84 | 1.61 | 7.05 | 0.03 | 0.13 | 0.04 | 0.18 | 0.04 | 0.18 |
| AMU3 | 0.19 | 0.84 | 1.61 | 7.05 | 0.03 | 0.13 | 0.04 | 0.18 | 0.04 | 0.18 |
| GEN1 | 0.37 | 1.63 | 49.30 | 218.91 | 0.02 | 0.09 | 0.03 | 0.12 | 0.03 | 0.12 |
| FC1 | <0.01 | 0.02 | <0.01 | 0.02 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 |
| FC2 | <0.01 | 0.02 | <0.01 | 0.02 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 |
| GEN2 | 1.68 | 0.42 | 0.22 | 0.06 | 0.27 | 0.07 | 0.03 | 0.01 | 0.03 | 0.01 |
| GEN3 | 2.93 | 0.73 | 0.48 | 0.12 | 0.41 | 0.01 | 0.06 | 0.02 | 0.06 | 0.02 |
| GEN4 | 1.02 | 0.26 | 0.80 | 0.20 | 0.51 | 0.13 | 0.10 | 0.03 | 0.10 | 0.03 |
| GEN5 | 1.02 | 0.26 | 0.80 | 0.20 | 0.51 | 0.13 | 0.10 | 0.03 | 0.10 | 0.03 |
| GEN6 | 0.48 | 0.12 | 0.34 | 0.09 | 0.30 | 0.08 | 0.04 | 0.01 | 0.04 | 0.01 |
| COAT1 | -- | -- | -- | -- | -- | 25.31 | -- | 20.19 | -- | 20.19 |
| TK-GAS | -- | -- | -- | -- | -- | 0.15 | -- | -- | -- | -- |
| WASH | -- | -- | -- | -- | -- | 0.34 | -- | -- | -- | -- |
| TANK1 | -- | -- | -- | -- | -- | -- | -- | -- | -- | -- |
| CT1 | -- | -- | -- | -- | -- | -- | 0.05 | 0.21 | <0.01 | <0.01 |
| HEAT1 | 1.64 | 7.17 | 1.38 | 6.02 | 0.09 | 0.39 | 0.12 | 0.55 | 0.12 | 0.55 |
| WELD | -- | -- | -- | -- | -- | -- | -- | 5.08 | -- | 5.08 |
| **Totals** | **13.42** | **29.34** | **61.26** | **260.40** | **2.41** | **27.98** | **0.93** | **28.01** | **0.88** | **27.80** |

Based on emission estimates submitted, the facility has total potential HAP emissions of 17.98 TPY. This is less than the major source threshold of 25 TPY of any combination of HAPs. Individual HAPs was verified to be less than the major source threshold for 10 TPY for a single HAP. The facility is therefore a minor source of HAP.

## SECTION VII. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the application are duplicated below. Records must be available to confirm the insignificance of the activities. Appropriate record-keeping of activities indicated below with "*" is specified in the Specific Conditions. Any activity to which a state or federal applicable requirement applies is not insignificant even if it is included on this list. Recordkeeping is not required for those operations, which qualify as trivial activities.

a. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBtu/hr heat input (commercial natural gas). The facility operates several natural gas-fired space heaters that meet these criteria.
b. *Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature. None identified but may be used in the future.

c. *Bulk gasoline or other fuel distribution with a daily average throughput less than 2,175 gallons per day, including dispensing, averaged over a 30-day period. None identified but may be used in the future. The gasoline storage tank at the facility (TK-GAS) is subject to the requirements of 40 CFR Part 63, Subpart CCCCCC, and is not considered an insignificant activity.
d. *Welding and soldering operations utilizing less than 100 pounds of solder and 53 tons per year of electrodes. The facility conducts various welding activities including ERW welding of slit and formed sheet coiled into tubing, all of which meet these criteria.
e. Hazardous waste and hazardous materials drum staging areas. The facility has hazardous waste and/or hazardous materials drum staging areas that may be used in the future.
f. Hand wiping and spray of solvents from containers with less than 1 liter capacity used for spot cleaning and/or degreasing in ozone attainment areas. The facility conducts hand wiping including the removal of excess paint and for maintenance purposes.
g. *Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant. None identified but may be used in the future.

## SECTION VIII. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions, but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the "Federal Regulations" section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emission Inventory, and Annual Fees) [Applicable]
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. The owner/operator will be required to submit emissions inventories and pay the appropriate fees.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 5 includes the general administrative requirements for Part 70 permits. This facility meets the definition of a major source since it has the potential to emit regulated pollutants in excess of 100 TPY. As such, a Title V (Part 70) operating permit is required. Any planned changes in the operation of the facility which result in emissions not authorized in the permit and which exceed the "Insignificant Activities" or "Trivial Activities" thresholds require prior notification to AQD and may require a permit modification or construction permit. Insignificant activities mean individual emission units that are either listed in Appendix I (OAC 252:100) or whose actual calendar year emissions do not exceed the following limits.

- 5 TPY of any one criteria pollutant
- 2 TPY of any one HAP or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for a single HAP that the EPA may establish by rule

Emission limitations and operational requirements necessary to assure compliance with all applicable requirements for all sources are taken from the construction permit, Permit No. 2021-0438-C PSD or are developed from applicable requirements.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Applicable]
Section 19-4 regulates emissions of PM from new and existing fuel-burning equipment, with emission limits based on maximum design heat input rating. Fuel-burning equipment is defined in OAC 252:100-19 as any internal combustion engine or gas turbine, or other combustion device used to convert the combustion of fuel into usable energy. Thus, the engines, burners of the DX Generator, furnace heater, and flame curtains at the facility are subject to the requirements of this section.

Appendix C of OAC 252:100 specifies a PM emission limitation of 0.6 lbs/MMBtu for all equipment with a heat input rating of 10 MMBtu/hr or less. Appendix C of OAC 252:100 also specifies a PM emission limitation for all equipment with a heat input capacity rating of greater than 10 MMBtu/hr but less than 1,000 MMBtu/hr based on the following calculation: $E = 1.0428080X^{-0.238561}$, where E is the allowable emission rate (lb/MMBtu), and X is the maximum heat input (MMBtu/hr). AP-42 (7/00), Table 3.2-1 lists an uncontrolled $PM_{10}$ emission factor (condensable and filterable) of 0.0483 lb/MMBtu for two-stroke, lean-burn engines, which is the most conservative PM emission factor listed in AP-42 (7/00), Section 3.2. AP-42 (7/98), Table 1.4-2 lists an uncontrolled PM emission factor of 7.6 lb/$10^6$ scf (approximately 0.0075 lb/MMBtu based on a fuel heat capacity of 1,020 Btu/scf) for natural gas combustion in heaters and boilers. As shown in the following table, the emission rates from the fuel-burning equipment at this facility are in compliance with the applicable particulate matter emission limits.

**OAC 252:100-19-4 Particulate Matter Emission Limits**

| EU ID | Maximum Heat Input | Appendix C Emission Limit | Emission Rate |
|---|---|---|---|
| | MMBtu/hr | lb/MMBtu | lb/MMBtu |
| FURN1 | 22.5 | 0.50 | <0.01 |
| BOIL1 | 12.6 | 0.60 | <0.01 |
| DRY1 | 1.3 | 0.60 | <0.01 |
| DRY2 | 1.3 | 0.60 | <0.01 |
| AMU1 | 5.635 | 0.60 | <0.01 |
| AMU2 | 5.635 | 0.60 | <0.01 |
| AMU3 | 5.635 | 0.60 | <0.01 |
| GEN1 | 3.80 | 0.60 | <0.01 |
| FC1 | 0.04 | 0.60 | <0.01 |
| FC2 | 0.04 | 0.60 | <0.01 |
| GEN2 | 0.58 | 0.60 | 0.05 |
| GEN3 | 1.25 | 0.60 | 0.05 |
| GEN4 | 2.06 | 0.60 | 0.05 |
| GEN5 | 2.06 | 0.60 | 0.05 |
| GEN6 | 0.08 | 0.60 | 0.05 |
| HEAT1 [(1)] | 16.7 (total)<br>0.1 (min)<br>0.2 (max) | --<br>0.60<br>0.60 | --<br><0.01<br><0.01 |

[(1)] HEAT1 represents multiple space heaters of various sizes.

The permit requires the use of pipeline natural gas (as defined under 40 CFR §72.2) to a limit of 0.5 grains of total reduced sulfur (TRS) per 100 scf (approximately 8.5 ppm) for all stationary fuel-burning sources to ensure compliance with the requirements of this section.

Section 19-12 limits emissions of particulate matter from industrial processes and direct-fired fuel-burning equipment based on their process weight rates. Appendix G of OAC 252:100 specifies a PM emission limitation for all processes with process weight rates of 30 tons per hour or less based on the following calculation: $E = 4.10P^{0.67}$, where E is the allowable emission rate (lb/hr) and P is the process weight rate (tons per hour). Appendix G of OAC 252:100 specifies a PM emission limitation for all processes with process weight rates of greater than 30 tons per hour based on the following calculation: $E = (55.00P^{0.11})-40$, where E is the allowable emission rate (lb/hr) and P is the process weight rate (tons per hour). As shown in the following table, the emission rates from directly fired fuel-burning units or any industrial processes are in compliance with the applicable particulate emission limits.

**OAC 252:100-19-12 Particulate Emission Limits**

| EU ID | Process Weight Rate | Appendix G Emission Limit | Actual PM Emissions |
|---|---|---|---|
| | TPH | lb/hr | lb/hr |
| COAT | 187.53 | 136.69 | 4.60 |
| CT1 | 550.44 | 281.23 | 0.05 |

The process weight rates for welding operations were determined to be less than 100 lb/hr. Per AQD policy, sources with a process weight rate of less than 100 lb/hr are exempt from the requirements of OAC 252:100-19-12.

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]
No discharge of greater than 20% opacity is allowed except for short-term occurrences that consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. When burning natural gas, there is very little possibility of exceeding the opacity standards. The applicant shall comply with all opacity limitations. Under normal operating conditions, this facility has negligible potential to violate this requirement; therefore, it is not necessary to require specific precautions to be taken.

OAC 252:100-29 (Fugitive Dust) [Applicable]
No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Under normal operating conditions, this facility will not cause fugitive dust problems; therefore, it is not necessary to require specific precautions to be taken.

OAC 252:100-31 (Sulfur Compounds) [Applicable]
Part 2, Section 31-7 limits the ambient air concentration of hydrogen sulfide ($H_2S$) emissions from any facility to 0.2 ppm at standard conditions (24-hour average), which is equivalent to 283 $\mu g/m^3$. Fuel-burning equipment fired with pipeline natural gas (as defined under 40 CFR §72.2) will not have the potential to exceed the $H_2S$ ambient air concentration limit.
Part 5, Section 31-25 limits sulfur dioxide emissions from new fuel-burning equipment (constructed or modified after July 1, 1972). For gaseous fuels the limit is 0.2 lb/MMBtu heat input averaged over 3 hours; for liquid fuels, the limit is 0.8 lb/MMBtu heat input averaged over 3 hours. The gas fuel limit is equivalent to approximately 0.2 weight percent sulfur in the fuel gas, which is equivalent to 2,000 ppmw sulfur. For combustion units burning gas, the permit requires the use of pipeline natural gas (as defined under 40 CFR §72.2) to a limit of 0.5 grains of total reduced sulfur (TRS) per 100 scf (approximately 8.5 ppm) for all stationary fuel-burning sources.

OAC 252:100-33 (Nitrogen Oxides) [Not applicable]
This subchapter limits new gas-fired fuel-burning equipment with rated heat input greater than or equal to 50 MMBtu/hr to emissions of 0.20 lbs of NOx per MMBtu, three-hour average. There are no equipment items at this facility that exceed the 50 MMBtu/hr threshold.

OAC 252:100-35 (Carbon Monoxide) [Not Applicable]
None of the affected sources are associated with this project: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds) [Applicable]
Part 3, Section 37-15 requires VOC storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to

be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The gasoline storage tank has a maximum storage capacity of less than 400 gallons. Therefore, the gasoline storage tank is not subject to the requirements of this section.

Part 5, Section 37-25 limits owners and operators of any coating line or coating operation with VOC emissions from using coatings that as applied contain VOCs in excess of the amounts listed under OAC 252:100-37-25(a), as duplicated in the following table. These coating type limits are expressed in pounds (lbs) of VOC per gallon of coating-as applied, excluding the volume of any water and exempt organic compounds. Emissions from the clean-up with VOCs of any article, machine, or equipment used in applying coatings shall be counted in determining compliance with this rule per OAC 252:100-37-26. The facility will be required to maintain records of monthly coating usage, keep records of SDS for each coating used, and demonstrate compliance with the emission limits under this section on an annual basis. Decorative, protective, or functional materials that consist of only protective oils for metal, acids, bases, or any combination of these substances are not considered coatings.

**VOC Coating Type Limits (As Applied) from OAC 252:100-37-25(a)**

| Coating Type | Definition | VOC Limitation lb/gal |
|---|---|---|
| Alkyd primer | A chemical coating composed primarily of alkyd applied to a surface to provide a firm bond between the substrate and any additional coating | 4.8 |
| Vinyl | A chemical coating containing plasticized or unplasticized polymers and co-polymers of vinyl acetate, vinyl chloride, polyvinyl alcohols or their condensation products. The primary mode of cure is solvent evaporation. | 6.0 |
| Nitrocellulose lacquer (NC lacquer) | A chemical coating containing nitrocellulose and suitable resinous modifiers. The primary mode of cure is solvent evaporation. | 6.4 |
| Acrylics | A chemical coating containing polymers or co-polymers of acrylic or substitute acrylic acid in combination with resinous modifiers. The primary mode of cure is solvent evaporation. | 6.0 |
| Epoxies | A chemical coating containing epoxy groups and suitable chemical cross-linking agents. The primary mode of cure involves a chemical reaction between the epoxy and the cross-linking agent. | 4.8 |
| Maintenance finishes | A chemical coating that protects a given substrate from adverse chemical or physical conditions. | 4.8 |
| Custom products finish | A proprietary chemical coating designed for a specific customer and use. | 6.5 |

Owners or operators of sources that emit less than 100 pounds of VOC per 24-hour day on a monthly average are exempt from the requirements of this Part. During the review of the Full Compliance Evaluation 10391, conducted on June 4, 2024, Webco provided calculations which showed the average daily VOC emissions from coatings to be 12.76 lbs VOC per 24-hr day. The

facility will be required to keep monthly records of VOC emissions calculations to demonstrate compliance with the 100 pounds of VOC per 24-hour exemption threshold, or maintain records of monthly coating usage, keep records of SDS for each coating used, and demonstrate compliance with the pounds of VOC per gallon emission limits under this section on an annual basis.

Part 7, Section 37-36 requires fuel-burning equipment to be cleaned, operated, and maintained so as to minimize VOC emissions. Based on manufacturer's data and good engineering practice, the equipment must not be overloaded, and temperature and available air must be sufficient to provide essentially complete combustion. The fuel-burning emergency generators, space heaters, and indirect-fired furnace heaters are affected fuel-burning equipment subject to this requirement.

OAC 252:100-39 (VOCs in Nonattainment & Former Nonattainment Areas) [Applicable]
In addition to any application of the requirements contained in 252:100-37, the additional requirements contained in Subchapter 39 shall be required of existing and new facilities located in Tulsa and Oklahoma Counties.
Part 7, Section 39-41 contains requirements for storage, loading, and transport/delivery of VOCs. Subsection 39-41(a) covers storage of VOCs in vessels with a storage capacity greater than 40,000 gallons. This facility does not have any VOC storage vessels with capacity greater than 40,000 gallons.
Subsection 39-41(b) covers storage of VOCs in vessels with a storage capacity of 400-40,000 gallons. The 300-gallon gasoline storage tank is not subject to this section as it has a maximum storage capacity less than the applicability threshold.
Part 7, Section 39-42 contains requirements for metal cleaning activities in Tulsa and Oklahoma County.
Subsection 42(a) covers cold solvent cleaning units, noting standards for construction and operation of such equipment. The requirements for cold solvent cleaning units are summarized in the table below. The parts washers are considered cold solvent cleaning units and are subject to the requirements of this subsection. All applicable requirements have been incorporated into the permit.

**Summary of Cold Solvent Cleaning Unit Requirements**

| | |
|---|---|
| **(1.) Equipment Requirements:** An owner or operator of any cold cleaning unit for metal degreasing which uses a VOC shall: | |
| A. | install a cover or door on the facility that can be easily operated with one hand; |
| B. | provide an internal drain board that will allow lid closure if practical; if not practical, provide an external drainage facility; and, |
| C. | attach a permanent, conspicuous label summarizing the operating requirements specified in 252:100-39-42(a)(2) to the facility. |
| **(2.) Operating Requirements:** As a minimum operators shall: | |
| A. | drain clean parts at least 15 seconds or until dripping ceases before removal; |
| B. | close degreaser cover when not handling parts in cleaner; |
| C. | store waste VOC in covered containers; |
| D. | not dispose or allow disposition of waste VOC in such a manner that more than 20 percent by weight can evaporate into the atmosphere; and |
| E. | use a solid fluid stream, not an atomized spray, when VOC is sprayed. |

| | |
|---|---|
| **(3.) Requirements for Controls:** If the vapor pressure of the VOC is greater than 0.6 psi (4.1 kPa) measured at 100°F (38°C) or if VOC is heated to 248°F (120°C), the owner or operator shall apply one or more of the following control devices/techniques. | |
| A. | Freeboard that gives a freeboard ratio greater than or equal to 0.7. |
| B. | Water cover where the VOC is insoluble in and denser than water or such equivalent. |
| C. | Another system of equivalent control as approved by the Division Director. |

Subsection 42(b) covers vapor-type metal degreasers, noting standards for construction and operation of such equipment. There are no operable vapor degreasers at the facility.
Subsection 42(c) contains operating and control requirements or conveyorized degreasing units. There are no such activities or equipment located at this facility.
Part 7, Section 39-46 applies to industries located in Tulsa County which manufacture and/or coat metal parts and products and establishes limitations in Subsection 39-46(d) for surface coatings in pounds of VOC per gallon of coating as applied (water and exempt compounds), as duplicated in the following table. Compliance with these emissions limits for surface coatings shall include VOC-containing materials used for cleanup Subsection 39-46(g). Compliance with the coating limits of Subsection 39-46(d) is required to be calculated on a daily weighted average basis per Subsection 39-46(f). The facility is also required to maintain records of monthly coating usage, keep records of SDS for each coating used, and demonstrate compliance with the emission limits under this section on an annual basis. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances are not considered coatings.

**VOC Coating Type Limits (As Applied) from OAC 252:100-39-46(d)**

| Coating Type | Definition | VOC Limitation lb/gal |
|---|---|---|
| Air or Forced Air Dry | Coatings that are dried by the use of air or forced warm air at temperatures up to 194°F. | 3.5 |
| Clear Coat | A coating that lacks color and opacity or is transparent and uses the undercoat as a reflectant base. | 4.3 |
| Extreme Performance | Coatings designed for harsh exposure or extreme environmental conditions (e.g., exposure to the weather all of the time, temperature above 200°F, detergents, abrasive and scouring agents, solvents, corrosive atmosphere or similar conditions). | 3.5 |
| Powder | A coating that is applied in a finely divided state by various method and becomes a continuous, solid film when the metal part or product is moved to an oven for curing. | 0.4 |
| Other | A coating that does not meet the definition any other coating type defined in OAC 252:100-39-46(b). | 3.0 |

Several individual coatings used at the facility have been identified to have VOC contents which exceed the air or forced air dry coating type and clear coat VOC emission limitations of this section; however, compliance with these limits is based on the daily weighed average basis of the coatings used. Specific conditions have been added to the permit requiring compliance with these limitations. During the review of the Full Compliance Evaluation 10391, conducted on June 4, 2024, Webco

provided calculations to demonstrate compliance with the limits above; actual weighted-average emissions were determined to be below the regulatory limits above. OAC 252:100-39-46(h) exempts facilities from the requirements of OAC 252:100-39-46(d) which have a potential to emit of 10 TPY of VOC emissions or less from coating operations. Specific conditions have been added to limit VOC emissions from coatings which are potentially subject to the emission limits of OAC 252:100-39-46(d) to less than 10 TPY VOC. However, OAC 252:100-39-46(h) states that once the 10 TPY emission limit is exceeded, the facility will always be subject to the requirements OAC 252:100-39-46.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]
This subchapter regulates TAC that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]
This subchapter provides general requirements for testing, monitoring, and recordkeeping and applies to any testing, monitoring, or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain, and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

Each emissions unit was evaluated for periodic testing in accordance with the Periodic Testing Standardization guidance issued December 1, 2011, on a pollutant-by-pollutant basis. Periodic testing requirements are not required for an emission unit that is subject to an applicable requirement that already requires periodic testing, continuous emission monitoring (CEM), or predictive emission monitoring (PEMS). The following sources are required to demonstrate compliance with emission limits by conducting periodic emission testing for the pollutants listed as indicated in the following table.

**Periodic Testing Review**

| EU ID | Point ID | Pollutant | TPY | Periodic Testing (Yes/No) |
|---|---|---|---|---|
| GEN1 | FC1 & FC2 / GEN1 Bypass | $NO_X$ | 1.63 | No |
| | | CO | 218.91 | **Yes** |
| | | VOC | 0.09 | No |
| | | $PM_{10/2.5}$ | 0.12 | No |
| COAT1 | COAT1 | VOC | 25.4 | No[(1)] |
| | | $PM_{10/2.5}$ | 38.76 | No |

(1) Mass balance does not require periodic testing; however, monitoring requirements are required.

The CO emissions from GEN1 (which include controlled emissions during normal operations of the furnaces and uncontrolled emissions which are released to the atmosphere through the bypass vent during furnace purging) are limited to 218.71 TPY. Per the December 1, 2011, Periodic Testing Standardization guidance, periodic testing is required at least every five (5) year or at least once during the permit term for sources where permitted emissions are greater than 100 TPY but less than 250 TPY. Upon completion of the initial testing requirements for GEN1, the permit requires periodic emissions testing of CO for GEN1 at least once every 60-month period with testing not to be completed within 730 days of any previously completed testing. December 1, 2011, Periodic Testing Standardization guidance, periodic testing is required at least every five (5) years or at least once during the permit term for sources where pre-controlled emissions are greater than 100 TPY, and once every five years where pre-controlled emissions are greater than 100 TPY but permitted emissions are between 40 TPY and 100 TPY. Additionally, the December 1, 2011, Periodic Testing Standardization guidance states "[e]missions of pollutants from individual emission unit that can be verified though mass balances without the use of assumed control efficiency can use periodic testing of the raw materials as a surrogate for periodic testing." Since VOC emissions from the coating operations will be limited to less than 100 TPY and emissions calculations are based on mass balance using coating SDS and actual material usage, the permit incorporates monitoring of the coating operations.

**The following Oklahoma Air Pollution Control Rules are not applicable to this facility:**

| | | |
|---|---|---|
| OAC 252:100-11 | Alternative Emissions Reduction | not requested |
| OAC 252:100-17 | Incinerators | not type of emission unit |
| OAC 252:100-23 | Cotton Gins | not type of emission unit |
| OAC 252:100-24 | Grain Elevators | not in source category |
| OAC 252:100-35 | Carbon Monoxide | not type of emission unit |
| OAC 252:100-39 | Nonattainment Areas | not in area category |
| OAC 252:100-47 | Landfills | not in source category |

## SECTION IX. FEDERAL REGULATIONS

PSD, 40 CFR Part 52 [Applicable]

The facility is a PSD major source because emissions of CO exceed the major source threshold. A PSD analysis, to include BACT and modeling, is required for any new PSD major source or for

any major modification of a PSD major source. A major modification is any physical change or change in the method of operations what would result in a significant emissions increase and a significant net emissions increase. A significant emissions increase or significant net emissions increase is any project emissions increase that exceeds the PSD SERs (e.g., 100 TPY CO, 40 TPY $NO_X$, 40 TPY $SO_2$, 25 TPY PM, 15 TPY $PM_{10}$, 10 TPY $PM_{2.5}$, 40 TPY VOC). Any future modifications must be evaluated for PSD applicability.

NSPS, 40 CFR Part 60 [Subpart JJJJ is Applicable]

Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units. This subpart affects steam generating units constructed after June 9, 1989, with a design heat input capacity of 100 MMBtu/hr or less, but greater than 10 MMBtu/hr. The furnace heaters (FURN1) has a design heat input capacities of 100 MMBtu/hr or less, but greater than 10 MMBtu/hr, and is subject to the requirements of this subpart. However, FURN1 meets the definition of a process heater, i.e., it does not heat a heat transfer medium, which is excluded from the definition of steam generating unit. Therefore, this unit is not subject to the requirement of this subpart. All other fuel-burning units on-site have design heat input capacities of less than 10 MMBtu/hr and are therefore not subject to the requirements of this subpart.

Subpart Kb, Volatile Organic Liquid (VOL) Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984. This subpart applies to VOL storage vessels which have a capacity of 19,812 gallons (40 $m^3$) or greater. The storage tank located on-site has a capacity below the minimum applicability threshold capacity of this subpart. Therefore, this subpart does not apply.

Subpart IIII, Stationary Compression Ignition Internal Combustion Engines (CI-ICE). This subpart affects stationary CI-ICE based on power and displacement ratings, depending on date of construction, beginning with those constructed after July 11, 2005, and manufactured after April 1, 2006, or engines reconstructed after July 11, 2005. There are no stationary CI-ICE located at this facility.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE). This subpart promulgates emission standards for all new SI engines ordered after June 12, 2006, and all SI engines modified or reconstructed after June 12, 2006, regardless of size. The specific emission standards (either in g/hp-hr or as a concentration limit) vary based on engine class, engine power rating, lean-burn or rich-burn, fuel type, duty (emergency or non-emergency), and numerous manufacture dates. Engine manufacturers are required to certify certain engines to meet the emission standards and may voluntarily certify other engines. An initial notification is required only for owners and operators of engines greater than 500 HP that are non-certified. The emergency generator engines on-site commenced construction after June 12, 2006, were manufactured after January 1, 2009, each have a maximum engine power greater than 25 hp and are therefore subject to the requirements of this subpart.

Per § 60.4233(d), "[o]wners and operators of stationary SI ICE with a maximum engine power greater than 19 KW (25 HP) and less than 75 KW (100 HP)… must comply with the emission standards in Table 1 to Subpart JJJJ for their emergency stationary SI ICE." Per § 60.4233(e), "[o]wners and operators of stationary SI ICE with a maximum engine power greater than or equal to 75 KW (100 HP)… must comply with the emission standards in Table 1 to Subpart JJJJ for their

stationary SI ICE. For owners and operators of stationary SI ICE with a maximum engine power greater than or equal to 100 HP (except gasoline and rich burn engines that use LPG) manufactured prior to January 1, 2011 that were certified to the certification emission standards in 40 CFR Part 1048 applicable to engines that are not severe duty engines, if such stationary SI ICE was certified to a carbon monoxide (CO) standard above the standard in Table 1 to this subpart, then the owners and operators may meet the CO certification (not field testing) standard for which the engine was certified." The applicable standards of Table 1 of Subpart JJJJ are listed as follows:

**Emission Standards from Table 1, Subpart JJJJ, g/hp-hr (ppmvd @ 15%$O_2$)**
**For Emergency Engines Burning Natural Gas [1]**

| Rated Power (hp) | Mfg. Date | $NO_X$ | CO | VOC [2] |
|---|---|---|---|---|
| 25<HP<130 | 1/1/2009 | 10 (N/A) [3] | 387 (N/A) | NA (N/A) |
| HP≥130 | 1/1/2009 | 2.0 (160) | 4.0 (540) | 1.0 (86) |

(1) Owners and operators of stationary non-certified SI engines may choose to comply with the emission standards in units of either g/hp-hr or ppm at 15 percent $O_2$.

(2) For purposes of this subpart, when calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

(3) The emission standards applicable to emergency engines between 25-hp and 130-hp are in terms of $NO_X$ + HC.

GEN2 and GEN6 each have a maximum engine power of greater than 25 HP and less than 100 HP. GEN3, GEN 4, and GEN5 each have a maximum engine power of greater than 130 HP. Owners or operators of an emergency stationary SI ICE that has a maximum engine power less than 130 HP that was built on or after July 1, 2008, or that has a maximum engine power greater than or equal to 130 HP and less than 500 HP that was built on or after January 1, 2011, and that do not meet the standards applicable to non-emergency engines, must install a non-resettable hour meter. Emergency stationary ICE may be operated with no time limits in emergency situations. Emergency stationary ICE may be operated up to 100 hours per calendar year for maintenance checks and readiness testing, which includes up to 50 hours per calendar year of operating during non-emergency situation. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

Engines complying with the emission standards of § 60.4233(d) or (e) must either purchase an engine certified to the procedures specified in Subpart JJJJ, or purchase a non-certified engine and demonstrating compliance with the emission standards of § 60.4233(d) or (e) according to the performance testing requirements of § 60.4244, as applicable. The generator engines on-site are all certified engines. The following table includes the EPA Engine Family Number of each of the engines.

| ID# | Make & Model | Serial Number | EPA Engine Family |
|---|---|---|---|
| GEN2 | Generac SG035 | 2112573 | GGNXB05.42NN |
| GEN3 | Generac QT80 | 6581448 | BGNXB06.62NN |
| GEN4 | Generac QT150 | 6561991 | BGNXB06.82C1 |
| GEN5 | Generac QT150 | 6561992 | BGNXB06.82C1 |
| GEN6 | Generac SG050 | 3001274232 | GGNXB05.42NN |

All applicable requirements will be incorporated into the permit.

NESHAP, 40 CFR Part 61 [Not Applicable]
There are no emissions of any of the regulated pollutants: arsenic, asbestos, benzene, beryllium, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J (Equipment Leaks of Benzene) concerns only process streams which contain more than 10% benzene by weight. All streams at Webco are less than 1% benzene by weight.

NESHAP, 40 CFR Part 63 [Subparts ZZZZ and CCCCCC Applicable]
Subpart Q, Industrial Process Cooling Towers. This subpart applies to all industrial process cooling towers (IPCTs) that utilize chromium–based water treatment chemicals located at a major source of HAP. This facility is not a major source of HAP; therefore, this subpart is not applicable.

Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. This subpart establishes standards for miscellaneous metals parts and products surface coating facilities for major sources of HAP. This subpart sets forth limitations on coating HAP content. Compliance with these limitations can be met through one of three options: 1) compliance material, 2) emission rate without add-on controls, and 3) emission rate with add-on controls. The facility is not a major source of HAP emissions; therefore, the facility is not subject to this subpart.

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions. Owners and operators of the following new or reconstructed RICE must meet the requirements of Subpart ZZZZ by complying with either 40 CFR Part 60 Subpart IIII (for CI engines) or 40 CFR Part 60 Subpart JJJJ (for SI engines):

1) Stationary RICE located at an area source;
2) The following Stationary RICE located at a major source of HAP emissions:
   (a) 2SLB and 4SRB stationary RICE with a site rating of ≤ 500 brake HP;
   (b) 4SLB stationary RICE with a site rating of < 250 brake HP;
   (c) Stationary RICE with a site rating of ≤ 500 brake HP which combust landfill or digester gas equivalent to 10% or more of the gross heat input on an annual basis;
   (d) Emergency or limited use stationary RICE with a site rating of ≤ 500 brake HP; and
   (e) CI stationary RICE with a site rating of ≤ 500 brake HP.

No further requirements apply for engines subject to NSPS under this part. Based on emission calculations, this facility is a minor source of HAP. A stationary RICE located at an area source of HAP emissions is new if construction commenced on or after June 12, 2006. The natural gas-fired emergency generator engines are considered new SI RICE located at an area source of HAP under this subpart and will meet the requirements of this subpart by complying with the requirements of 40 CFR Part 60 (NSPS), Subpart JJJJ. The permit incorporates all applicable requirements.

Subpart DDDDD, Industrial, Commercial and Institutional Boilers and Process Heaters. This subpart establishes notional emission limitations and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial and institutional boilers and process heaters located at major sources of HAP. This facility is not a major source of HAP.

Subpart CCCCCC, Gasoline Dispensing Facilities. This subpart establishes emission limitations and management practices for HAP emitted from the loading of gasoline storage tanks at gasoline dispensing facilities (GDF) located at an area source of HAP emissions. GDF means any stationary facility which dispenses gasoline into the fuel tank of a motor vehicle. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank. The gasoline storage tank has a monthly throughput of less than 10,000 gallons and is required to comply with the requirements of §63.11116, which requires the facility to follow housekeeping measures to minimize the release of gasoline vapors to the atmosphere. All applicable requirements have been incorporated into the permit.

Subpart HHHHHH, Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. This subpart establishes requirements for area sources of HAP involving paint stripping operations involving the use of chemical strippers containing methylene chloride (MeCl), autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, and spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). This facility does not engage in stripping operations or autobody refinishing operations. The facility does not use spray coating paints that contain any of the target HAPs in this subpart. Therefore, the facility is not subject to the requirements of this subpart.

Subpart JJJJJJ, Industrial, Commercial, and Institutional Boilers Area Sources. This subpart applies to new and existing industrial, commercial, and institutional boilers located at area sources of HAPs. The furnace heaters, DX Generator burners, and space heaters meet the definition of process heaters which are excluded from the definition of a boiler. Therefore, these units are not subject to the requirements of this subpart.

Subpart WWWWWW, Plating and Polishing Operations at Area Sources. This subpart applies to "plating and polishing" facilities engaged in one or more plating and polishing process located at minor sources of HAP emissions and which has emissions of compounds of one or more plating and polishing metal HAP. Plating and polishing processes include non-chromium electroplating, electroless or non-electrolytic plating, other non-electrolytic metal coating processes, dry mechanical polishing of finished metals and formed products after plating or thermal spraying, electroforming, and electropolishing. Plating and polishing metal HAP include cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), and nickel (Ni). The facility does not engage in any of the listed processes; therefore, this subpart is not applicable.

Subpart XXXXXX, Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. This subpart applies to owners and operators of area sources that primarily engage in electrical and electronic equipment finishing operations, fabricated metal products, fabricated plate work (boiler shops), fabricated structural metal manufacturing, heating equipment (except electric), industrial machinery and equipment finishing operations, iron and steel forging, primary metal products manufacturing, or valve and pipe fittings. Affected sources include dry abrasive blasting, machining, dry grinding and dry polishing with machines, spray painting, and welding. The primary NAICS for the facility is 331210 (Iron and Steel Pipe and Tube Manufacturing from

Purchased Steel). This activity is not one of the listed NAICS affected source categories under this subpart. Therefore, this subpart does not apply.

Compliance Assurance Monitoring, 40 CFR Part 64 [Applicable]
Compliance Assurance Monitoring (CAM) applies to any pollutant-specific emission unit at a major source that is required to obtain a Title V permit, if it meets all of the following criteria:

1. It is subject to an emission limit or standard for an applicable regulated air pollutant,
2. It uses a control device to achieve compliance with the applicable emission limit or standard, and
3. It has potential emissions, prior to the control device, of the applicable regulated air pollutant equal to or greater than major source thresholds (e.g., 100 TPY).

Emissions from DX Generator 141 (GEN1), which is associated with Furnace 141 (FURN1) is controlled by flame curtains and has potential uncontrolled CO emissions which exceed 100 TPY. Therefore, GEN1 is potentially subject to CAM. Emissions from the remaining equipment items have potential emissions that are below major source thresholds and are, therefore, not subject to CAM.

GEN1 has CO emissions after control greater than the major source thresholds and is a large pollutant specific emission unit (LPSEU) as defined in §64.5(a). CAM plans for LPSEU are required to be submitted as part of an application for an initial Part 70 permit for applications submitted after April 20, 1998. However, since GEN1 is subject to an emission limitation or standard for which the Part 70 permit will specify a continuous compliance determination method, as defined in §64.1, it is exempt from the requirements of this part per §64.2(b)(vi). GEN1 is controlled using flame curtains located at the exit and entrance of the furnace. The permit establishes continuous monitoring of the presence of a flame for all burner of the flame curtains when the DX Generator is operating to ensure compliance with the established emission limits. The system records every instance when a flame outage occurs. Additionally, the controlled emissions from each annealing operating mode are based on EPA Reference Method stack testing and are not based on an assumed control device emissions reduction factor.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]
This facility does not process or store more than the threshold quantity of any regulated substance (Section 112r of the Clean Air Act 1990 Amendments). More information on this federal program is available on the web page: *www.epa.gov/rmp*.

Stratospheric Ozone Protection, 40 CFR Part 82 [Subparts A and F are Applicable]
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds

under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.

Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.

The Standard Conditions of the permit address the requirements specified at §82.156 for persons opening appliances for maintenance, service, repair, or disposal; §82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; §82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; §82.166 for recordkeeping; § 82.158 for leak repair requirements; and §82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

This facility does not utilize any Class I & II substances in the manufacturing process.

## SECTION X. COMPLIANCE

The Specific Conditions of this permit contain various testing, monitoring, recordkeeping, and reporting requirements in order to document on-going compliance with emission limits. The specific methods used to document compliance were based on the type of emission unit, the type of process equipment, the specific pollutants emitted, and the amount of permitted emissions taking into account other regulatory requirements that an emission unit may be subject to.

In addition to the permitting requirements, the following periodic inspections were conducted over the last five years.

| Inspection Type | Date | Summary/Results |
|---|---|---|
| Self-Disclosure | 3/1/2021 | Resulted in Enforcement ID No. 10046. A self-disclosure was submitted for operating as a major source without obtaining a major source construction or operating permit. One unit (GEN1) was historically misclassified as a typical fuel-burning unit. This unit has now been identified to be a significant emitter of CO, with facility-wide emissions being above PSD major source levels. The applicant was required to submit a major PSD construction permit application, where BACT and modeling for CO was required. Penalties on this enforcement action have been paid. |
| Full Compliance Evaluation | 6/4/2024 | No violations or areas of concern were identified during the Full Compliance Evaluation. |

## SECTION XI. TIER CLASSIFICATION, PUBLIC AND EPA REVIEW

This application has been determined to be a **Tier II** based on the request for an initial Part 70 major source operating permit under OAC 252:100-8-4(b)(1). The preceding construction permit to this major source operating permit, Permit No. 2021-0438-C PSD, was processed through the "traditional NSR process." This Title V operating permit will require a 30-day public review period and a 45-day EPA review period as described in OAC 252:100-8-8 and OAC 252:4-7. The public and EPA review periods will be concurrent, unless comments are received from the public.

The applicant published a "Notice of Filing a Tier II Application" on September 16, 2024, in the *Tulsa World*, a daily newspaper printed and published in the City of Tulsa, County of Tulsa, in the State of Oklahoma, and having general circulation therein. The "Notice of Filing a Tier II Application" stated that the application was available for public review at the Charles Page Library, 551 E. 4th St., Sand Springs, OK 74063, and at the Air Quality Division main office.

The applicant will publish the "Notice of Tier II Draft Permit" as a legal notice in a newspaper of general circulation in the area where the source is located. The "Notice of Tier II Draft Permit" will state that the draft permit will be available for public review at a location in the county where the facility is located, and that the draft permit will also be available for public review at the Air Quality Division main office and Regional Office in Tulsa. The draft permit will be available for a 30-day public review period.

The draft/proposed permit will be submitted for a 45-day EPA review. If no comments are received from the public, the draft/proposed permit will be deemed the proposed permit.

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of OAC 252:100-8-8(j) may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302. A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period,

or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under OAC 252:100-8-8(j), the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection under OAC 252:100-8-8(j), the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

This facility is not located within 50 miles of the Oklahoma border and any other state. Tribal Nations will be notified of the draft permit.

The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the property.

The information on all permit actions is available for review by the public in the Air Quality section of the DEQ web page at https://www.deq.ok.gov.

## SECTION XII. SUMMARY

The facility was constructed and is operating as described in the permit application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues that would prevent issuance of this permit. Issuance of the permit is recommended, contingent upon public, Tribal Nation, and EPA reviews.

# PERMIT TO OPERATE
# AIR POLLUTION CONTROL FACILITY
# SPECIFIC CONDITIONS

**Webco Industries, Inc.** **Permit No. 2021-0438-TV**
**Star Center Tube** **Facility ID: 7898**

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on October 4, 2021, and supplemental information received thereafter. The Evaluation Memorandum dated November 4, 2024, is attached to this permit to explain the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating limitations or permit requirements. Continuing operations under this permit constitutes acceptance of and consent to, the conditions contained herein:

1. Points of emissions and emission limitations: [OAC 252:100-8-6(a)(1)]

**a. EUG 1: Furnace Heaters**

i. Emissions from the furnace heaters shall be limited to the following maximum design heat input ratings and emission limits:

| ID# | Description | Maximum Design Heat Input Rating | $NO_X$ | CO |
|---|---|---|---|---|
| | | MMBtu/hr | TPY | TPY |
| FURN1 | Furnace 141 | 22.5 | 9.66 | 8.12 |

ii. Compliance with the TPY emission limits shall be based on the 12-month rolling total of monthly emission calculations based on fuel consumption or maximum heater ratings and AP-42, Section 1.4 emission factors and demonstrated by means of maintaining records on-site.

**b. EUG 2: DX Generators**

i. Emissions Limits:

A. The following BACT CO emissions limits apply to GEN1.
[OAC 252:100-8-34(b) & Permit No. 2021-0438-C PSD]

| EU ID | Operating Type | CO Emissions Limits (1) |
|---|---|---|
| | | lb/hr |
| GEN1 | Normal Operations | 49.3 |
| | Bypass Venting | 142.0 |

(1) Compliance shall be demonstrated based on a 3-hr average.

I. Compliance with these emission limits shall be demonstrated through initial compliance testing as required under Specific Condition No. 1.b.iii and periodic compliance testing as required under Specific Condition No. 1.b.iv. Testing shall consider the capture efficiencies as determined under Specific Condition No. 1.b.iii.B.IV.

B. Emissions from GEN1 shall be limited to the following maximum design heat input ratings and emission limits:

| ID# | Maximum Design Heat Input Rating | CO |
|---|---|---|
| | MMBtu/hr | TPY |
| GEN1 | 3.80 | 218.91 (1) |

(1) Includes normal operations and bypass venting.

I. Compliance with the CO TPY emission limits shall be based on 12-month rolling totals of monthly emission calculations based on the operating mode, stack testing, and hours of operation for each operating mode during each month and demonstrated by means of maintaining records on-site.

ii. Operating Limitations and Requirements:

A. Flame curtains shall be installed at the inlets and outlets of the furnace (FURN1) and shall operate at all times when the furnace and associated DX Generator are operating. The flame curtains must be installed and operated as follows as required by BACT: [OAC 252:100-8-34(b) & OAC 252:100-8-35]

I. The flame burners/tips of the flame curtains shall be installed, operated, and maintained in accordance with manufacturer's instructions.

II. One or more controller systems, which is tied to the Programmable Logic Controller (PLC) tracking, shall be installed which monitors and records the presence of a flame for all flame tips of the flame curtains when the DX Generator is running. The system shall trigger a rotating alarm (both visual and auditory) when a flame outage occurs at any one of the flame tips.

III. The operating status of the flame tips (i.e., "on" or "off") shall be transmitted to and displayed at the inlet operator station of the associated furnace, the outlet operator station of the associated furnace, and the maintenance human-machine interface.

IV. Visible lights which indicate the status of flame tip operations shall be installed at each of the furnace openings, and at the DX Generator.

B. Bypass venting of the DX Generator (GEN1) directly to the atmosphere shall only occur as permitted below: [OAC 252:100-8-34(b) & OAC 252:100-8-35]

I. Total hours of bypass venting shall not exceed 95 hours in any 12-month period.

II. Bypass venting shall only be permitted under the following circumstances:

a. During emergency conditions;
b. When the DX Generator and associated furnace are shut down and started up for maintenance; and
c. When purging the atmosphere in the furnace when switching to a new atmospheric process, except as prohibited by Specific Condition No. 1.b.ii.B.V.

III. Each instance shall be documented and shall include the cause, duration, and calculated emissions of the bypass venting.
IV. Bypass venting is permitted for venting during the "lean" exothermic gas generation mode of the DX Generator.
V. Bypass venting is prohibited for venting during the "rich" exothermic generation mode of the DX Generators, unless qualifying as an emergency event.
VI. The DX Generator shall have an installed electronic valve system, which is tied to the PLC tracking, to record the duration of each bypass event (in minutes). A rotating alarm (both visual and auditory) will be tied into the electronic valve system and will trigger during every bypass venting event.

C. The owner/operator shall develop and maintain operator work instructions for the DX Generators to include target differential pressure settings of the inlet air and inlet natural gas lines for the DX Generator and target flow rates for each air/gas ratio operating mode.

D. For the DX Generator, the owner/operator shall record the manometer differential pressure readings (in inches) of the inlet air and inlet natural gas lines of the DX Generator at least once daily or after changing to a new operating mode, whichever is more frequent. Readings shall include any corrections for capillary error and corrections for temperature from standard conditions.

E. The owner/operator shall conduct semi-annual inspections and calibration checks of the differential pressure measurement devices for the inlet air and inlet natural gas lines to the DX Generator including, but not limited to, the following:

I. Inspect the orifice plates for wear or damage. If signs of wear or damage are identified, replace the orifice plate. Keep records of inspections and orifice plate replacements.
II. Conduct calibration checks on each of the differential pressure u-tube manometers. Calibration checks shall include, but are not limited to, zero error checks, scale error checks, and capillary error checks. Corrective actions shall be made for any calibration checks which do not meet the manometer manufacturer calibration specifications. Keep records of calibration check results and corrective actions made.

iii. Initial Testing Requirements:

A. Within 24 months of the issuance of Permit No. 2021-0438-C PSD, issued June 11, 2024, the permittee shall conduct initial compliance testing of CO emission from the DX Generator 141 (GEN1) associated with Furnace 141 (FURN1) when operating. Each test shall meet the general testing requirements of Specific Condition No. 1.b.iii.B and shall include the following: [OAC 252:100-43]

I. Testing for each of the following operating modes:

a. the "rich" 7:1 air-gas ratio low temperature operating mode;
b. the "rich" 7:1 air-gas ratio high temperature operating mode;
c. the "lean" 9:1 air-gas ratio low temperature operating mode; and
d. the "lean" 9:1 air-gas ratio high temperature operating mode.

II. For each operating mode identified under Specific Condition No. 1.b.iii.A.I, all the following shall be conducted during the same testing period:

a. Testing of the gases in the supply line from the DX Generator to the furnace;
b. Testing of the emissions captured by the furnace inlet collection hood; and
c. Testing of the emissions captured by the furnace outlet collection hood.
d. Monitoring of the furnace operating temperature.

III. The testing results shall be used to:

a. Demonstrate compliance with the lb/hr emission limits of Specific Condition No. 1.b.i.A;
b. Determine the highest emissions producing operating mode as relied upon for Specific Conditions No. 1.b.iv.A.I and II;
c. Determine the collection efficiency of the furnace inlet and outlet hoods and collection system as required under Specific Condition No. 1.b.iii.B.IV; and
d. Establish the normal furnace operating temperature range for each operating mode tested which will be relied upon in Specific Condition No. 1.b.iv.A.III.

IV. For any operating mode not tested as required above, the written report required by Specific Condition No. 1.b.iii.B.VI must include the reasons why the operating mode was not tested.

B. General Testing Requirements [OAC 252:100-8-6(a)(3)(A) & OAC 252:100-43]

I. Required testing of CO emissions shall be conducted using approved reference methods as listed below.

a. Method 1: Sample and Velocity Traverses for Stationary Sources.
b. Method 2: Determination of Stack Gas Velocity and Volumetric Flow Rate.
c. Method 3 or 3A: Gas Analysis for $CO_2$, Excess Air, and Dry Molecular Weight.
d. Method 4: Determination of Moisture in Stack Gasses.
e. Method 10: Determination of CO Emissions from Stationary Sources or Method 320: Measurement of Vapor Phase Organic and Inorganic Emissions by Extractive Fourier Transform Infrared Spectroscopy.

II. Testing shall conform with the Guidelines for Conducting Air Quality Stack Tests in Oklahoma (December 20, 2018), located at https://www.deq.ok.gov/wp-content/uploads/air-division/PG_Stack_Test_Guidance.pdf.
III. The owner/operator shall record the differential pressure readings (in inches) at the manometers for the inlet air and inlet natural gas to the DX Generator being tested for each testing run conducted.
IV. The capture efficiency of the furnace inlet and outlet hoods and collection systems shall be determined during testing using one of the following methods:

a. Erecting of a permanent or temporary enclosure at each furnace inlet and outlet hood and collection systems during testing. The enclosure shall meet the requirements of Method 204 for Permanent or Temporary Enclosure for Determining Capture Efficiency.
b. Mass balance of the CO and $CO_2$ concentrations tested from the DX generator supply line and compared to the CO and $CO_2$ concentrations tested from the hood and collection system of a furnace's inlet and outlet.

V. A protocol describing the testing plan shall be submitted to the Air Quality Division at least 30 days prior to the testing.
VI. A written report documenting the results of emissions testing shall be submitted within 60 days of completion of on-site testing. The written report shall include the manometer readings for each testing run conducted and shall document the normal furnace internal temperature range during each test run. The normal furnace internal temperature range may include a safety factor (e.g., ± X%, ± X°F, etc.).

iv. Periodic Testing Requirements:

A. After initial compliance testing has been conducted as required in Specific Condition No. 1.b.iii.A, the permittee shall conduct periodic compliance testing of CO emissions, at least at least once every 60-month period, from the DX Generator (GEN1) associated with Furnace 141 (FURN1) when operating under representative conditions. The required testing shall not be conducted within 730

days of any previously completed testing of the source. Each test shall meet the general testing requirements of Specific Condition No. 1.b.iv.B and shall include the following: [OAC 252:100-43]

I. Testing of the gases in the supply line from the DX Generator to the furnace during the highest emissions producing operating mode as determined by testing conducted under Specific Condition No. 1.b.iii.A. The testing results shall be used to demonstrate compliance with the lb/hr emission limits for bypass venting operations of Specific Conditions No. 1.b.i.A.
II. Testing of the furnace inlet and outlet during the highest emissions producing operating mode as determined by testing conducted under Specific Condition No. 1.b.iii.A. The sum of the testing results of the furnace inlet and outlet shall be used to demonstrate compliance with the lb/hr emission limits for normal operations of Specific Conditions No. 1.b.i.A.
III. Monitoring of the furnace operating temperature during the highest emissions producing operating mode as determined by testing conducted under Specific Condition No. 1.b.iii.A. The furnace shall be operating with the furnace internal operating temperature range documented in Specific Condition No. 1.b.iii.B.VI.

B. General Testing Requirements [OAC 252:100-8-6(a)(3)(A) & OAC 252:100-43]

I. Required testing of CO emissions shall be conducted using portable analyzers or an equivalent method approved by Air Quality.
II. Testing shall conform with the Guidelines for Portable Electrochemical Analyzer Testing used for Compliance Monitoring (Revised March 7, 2003), located at https://www.deq.ok.gov/wp-content/uploads/air-division/PG_PEA_Guidance.pdf.
III. The owner/operator shall record the differential pressure readings (in inches) at the manometers for the inlet air and inlet natural gas to the DX Generator being tested for each testing run conducted.
IV. A protocol describing the testing plan shall be submitted to the Air Quality Division at least 30 days prior to the testing.
V. A written report documenting the results of emissions testing shall be submitted within 60 days of completion of on-site testing. The written report shall include the manometer readings for each testing run conducted and shall document the normal furnace internal temperature range during each test run.

**c. EUG 3: Emergency Generators Engine(s)**

i. The facility is authorized to operate the emergency generator engine(s) as listed below.

| EU ID# | Point ID# | EU Description | Rating (hp) | Fuel |
|---|---|---|---|---|
| GEN2 | GEN2 | Generac SG035 | 76 | Natural Gas |
| GEN3 | GEN3 | Generac QT080 | 133 | Natural Gas |
| GEN4 | GEN4 | Generac QT150 | 231 | Natural Gas |

| EU ID# | Point ID# | EU Description | Rating (hp) | Fuel |
|---|---|---|---|---|
| GEN5 | GEN5 | Generac QT150 | 231 | Natural Gas |
| GEN6 | GEN6 | Generac SG050 | 86 | Natural Gas |

ii. Each of the emergency generators shall be limited to operate not more than 500 hours in any 12-month period. Hours of operation shall be monitored using a non-resettable hour meter. [OAC 252:100-8-6(a)]

iii. Each of the emergency generator engines shall have a permanent identification plate attached that shows the make, model number, and serial number. [OAC 252:100-43]

iv. The permittee shall comply with all applicable requirements in 40 CFR Part 60, Subpart JJJJ, for Stationary Spark Ignition Internal Combustion Engines, for each affected engine including but not limited to the following: [40 CFR §§60.4230 to 60.4248]

A. § 60.4230 Am I subject to this subpart?
B. § 60.4231 What emission standards must I meet if I am a manufacturer of stationary SI internal combustion engines or equipment containing such engines?
C. § 60.4232 How long must my engines meet the emission standards if I am a manufacturer of stationary SI internal combustion engines?
D. § 60.4233 What emission standards must I meet if I am an owner or operator of a stationary SI internal combustion engine?
E. § 60.4234 How long must I meet the emission standards if I am an owner or operator of a stationary SI internal combustion engine?
F. § 60.4235 What fuel requirements must I meet if I am an owner or operator of a stationary SI gasoline fired internal combustion engine subject to this subpart?
G. § 60.4236 What is the deadline for importing or installing stationary SI ICE produced in previous model years?
H. § 60.4237 What are the monitoring requirements if I am an owner or operator of an emergency stationary SI internal combustion engine?
I. § 60.4243 What are my compliance requirements if I am an owner or operator of a stationary SI internal combustion engine?
J. § 60.4244 What test methods and other procedures must I use if I am an owner or operator of a stationary SI internal combustion engine?
K. § 60.4245 What are my notification, reporting, and recordkeeping requirements if I am an owner or operator of a stationary SI internal combustion engine?
L. § 60.4246 What General Provisions and confidential information provisions apply to me?
M. § 60.4248 What definitions apply to this subpart?

v. The owner/operator shall comply with all applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), Subpart ZZZZ, for each affected engine including but not limited to: [40 CFR §§ 63.6580 to 63.6675]

A. § 63.6580 What is the purpose of subpart ZZZZ?
B. § 63.6585 Am I subject to this subpart?

C. § 63.6590 What parts of my plant does this subpart cover?
D. § 63.6595 When do I have to comply with this subpart?
E. § 63.6603 What emission limitations, operating limitations, and other requirements must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?
F. § 63.6605 What are my general requirements for complying with this subpart?
G. § 63.6612 By what date must I conduct initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary ICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?
H. § 63.6615 When must I conduct subsequent performance tests?
I. § 63.6620 What performance tests and other procedures must I use?
J. § 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?
K. § 63.6630 How do I demonstrate initial compliance with the emission limitations, operating limitations, and other requirements?
L. § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
M. § 63.6640 How do I demonstrate continuous compliance with the emission limitations, operating limitations, and other requirements?
N. § 63.6645 What notifications must I submit and when?
O. § 63.6650 What reports must I submit and when?
P. § 63.6655 What records must I keep?
Q. § 63.6660 In what form and how long must I keep my records?
R. § 63.6665 What parts of the General Provisions apply to me?
S. § 63.6670 Who implements and enforces this subpart?
T. § 63.6675 What definitions apply to this subpart?

**d. EUG 4: Coatings**

i. Emissions from coating operations and usage of VOC containing materials at the facility shall be limited to 90.0 TPY of VOC. Compliance with this emission limit shall be calculated monthly on a 12-month rolling total basis and shall be based on a mass balance of the VOC content of the coatings and materials used during the month.

[OAC 252:100-8-6(a)(1)]

ii. Unless meeting the exemption criteria of Specific Condition No. 1.d.iii, the permittee shall maintain records of the product usage records demonstrating that the coatings as applied comply with the following VOC standards in OAC 252:100-37-25(a), excluding the volume of any water and exempt organic compounds and shall include all solvents used to cleanup any article, machine, or equipment used in applying coatings.

[OAC 252:100-37-25(a), OAC 252:100-37-25(c), & OAC 252:100-37-26]

| Coating Type | VOC Emission Limits lb / gallon of coating |
|---|---|
| Alkyd Primers | 4.8 |
| Epoxies | 4.8 |
| Maintenance Finishes | 4.8 |
| Vinyls | 6.0 |
| Acrylics | 6.0 |
| NC Lacquers | 6.4 |
| Custom Product Finishes | 6.5 |

iii. The permittee shall maintain records of the VOC emissions showing whether the facility VOC emissions from coating operations are below the exemption level listed in OAC 252:100-37-25(c), 100 lbs per 24-hour day on a monthly average.

iv. The VOC content of coatings shall not exceed the following limits unless the exemption criteria under Specific Condition No. 1.d.vi is met. Compliance with these limits shall be calculated on a daily weighted average basis.
[OAC 252:100-39-46(d) & OAC 252:100-39-46(f)]

| Coating Type | VOC Emission Limits lb / gallon of coating |
|---|---|
| Air or Forced Air Dry | 3.5 |
| Clear Coat | 4.3 |
| Extreme Performance | 3.5 |
| Powder | 0.4 |
| Other | 3.0 |

v. VOC-containing materials used for cleanup shall be considered in the VOC content limits of Specific Condition No. 1.d.iv unless: [OAC 252:100-39-46(g)]

A. The VOC containing materials are maintained in a closed container when not in use;
B. Closed containers are used for the disposal of cloth or paper or other materials used for surface preparation and cleanup;
C. The spray equipment is disassembled and cleaned in a VOC vat and the vat is closed when not in use; or,
D. The VOC containing materials used for the cleanup of spray equipment are sprayed directly into closed containers.

vi. VOC emissions from coating operations which are potentially subject to OAC 252:100-39-46(d) shall be limited to less than 10 TPY to qualify for the exemption from the emission limits in OAC 252:100-39-46(d) and Specific Condition No. 1.d.iv. Compliance with this emission limit shall be calculated monthly on a 12-month rolling total basis and shall be based on a mass balance of the VOC content of the coatings and materials used during the month. If this VOC emission limit is exceeded, the facility

will always be subject to OAC 252:100-39-46(d) as required under Specific Condition No. 1.d.iv. [OAC 252:100-39-46(h)]

**e. EUG 5: Tanks**

i. Emissions from storage tanks are estimated based on existing equipment and liquid throughput of each tank but do not have any specific emissions limits.

ii. The gasoline tank (TK-GAS) at the facility is subject to 40 CFR Part 63, Subpart CCCCCC, "Gasoline Dispensing Facilities." The permittee shall comply with all applicable requirements, including but not limited to the following:
[40 CFR §§ 63.11110 to 63.11132]

**What this subpart covers**
A. §63.11110, What is the purpose of this subpart?
B. §63.11111, Am I subject to the requirements in this subpart?
C. §63.11112, What parts of my affected source does this subpart cover?
D. §63.11113, When do I have to comply with this subpart?
**Emission Limitations and Management Practices**
E. §63.11115, What are my general duties to minimize emissions?
F. §63.11116, Requirements for facilities with monthly throughput of less than 10,000 gallons of gasoline.
**Testing and Monitoring Requirements**
G. §63.11120, What testing and monitoring requirements must I meet?
**Notification, Records, and Reports**
H. §63.11124, What notifications must I submit and when?
I. §63.11125, What are my recordkeeping requirements?
J. §63.11126, What are my reporting requirements?
**Other Requirements and Information**
K. §63.11130, What parts of the General Provisions apply to me?
L. §63.11131, Who implements and enforces this subpart?
M. §63.11132, What definitions apply to this subpart?

**f. EUG 6: Parts Washers**

i. Compliance with the VOC emissions limit for coating operations of Specific Condition No. 1.d.i shall include emissions from the parts washers. Compliance with this emission limit shall be calculated monthly on a 12-month rolling total basis and shall be based on a mass balance of the VOC content of the coatings used during the month. [OAC 252:100-8-6(a)(1)]

ii. The permittee shall operate the parts washers in accordance with the cold cleaning facility requirements of OAC 252:100-39-42(a) which includes, but is not limited to, the following: [OAC 252:100-39-42(a)]

A. The permittee of any cold cleaning unit for metal degreasing which uses a VOC shall:

I. install a cover or door on the facility that can be easily operated with one hand;
II. provide an internal drain board that will allow lid closure if practical; if not practical, provide an external drainage facility; and
III. attach a permanent, conspicuous label summarizing the operating requirements specified in OAC 252:100-39-42(a)(2) to the facility.

B. Owners or operators shall at a minimum:

I. drain clean parts at least 15 seconds or until dripping ceases before removal;
II. close degreaser cover when not handling parts in cleaner;
III. store waste VOC in covered containers;
IV. not dispose or allow disposition of waste VOC in such a manner that more than 20 percent by weight can evaporate into the atmosphere; and
V. use a solid fluid stream, not an atomized spray, when VOC is sprayed.

C. If the vapor pressure of the VOC is greater than 0.6 psi measured at 100°F or if VOC is heated to 248°F, the owner or operator shall apply one or more of the following control devices/techniques.

I. Freeboard that gives a freeboard ratio greater than or equal to 0.7.
II. Water cover where the VOC is insoluble in and denser than water or such equivalent.
III. Another system equivalent control as approved by the Division Director.

D. Compliance shall be determined in accordance with EPA guidance document "Control of Volatile Organic Emissions from Solvent Metal Cleaning," 450/2-77-022. Test reports and maintenance and repair records of control equipment shall be maintained by the source for at least two years.

**g. EUG 7: Pickling**

i. Emissions from the sulfuric acid pickling tank shall be limited to the following emission limits:

| ID# | Description | $H_2SO_4$ TPY |
|---|---|---|
| TANK | Sulfuric Acid Pickling Tank | 6.86 |

ii. Compliance with the TPY emission limits shall be based on a 12-month rolling total of monthly emission calculations using the Esco Engineering Estimation of Losses from Open Tanks Containing Sulfuric Acid worksheet (http://pas.mnsi.net/) and demonstrated by means of maintaining records on-site.

iii. A foaming inhibitor shall be used in the pickling tank operations when operating.

**h. EUG 8: Cooling Towers**

i. The permittee shall conduct initial testing of total dissolved solid (TDS) concentration (ppmw) of the cooling tower water within 60 days of the issuance of Permit No. 2021-0438-C PSD, issued June 11, 2024.

ii. The following records shall be kept for all cooling towers operating at the facility:

A. Records of initial testing of cooling tower water total dissolved solids (TDS) concentration (ppmw);
B. Records of vendor certification of maximum recirculation rate (gallons/minute); and
C. Records of design and construction showing 0.005% or less drift.

**i. EUG 9: Space Heaters**

A. Emissions from space heaters are estimated based on existing equipment, fuel usage, and the design heat input capacity of each heater. The space heaters do not have any specific limitations, and are considered Insignificant Activities.

**j. EUG 10: Welding**

A. Emissions from welding are estimated based on existing equipment and welding rod usage. Welding operations do not have any specific limitations and are considered Insignificant Activities. Records shall be maintained as required under Specific Condition No. 7.c.

2. The permittee shall be authorized to operate the facility continuously (24 hours per day, every day of the year). [OAC 252:100-8-6(a)(1)]

3. The stationary fuel-burning sources operating at this facility shall be fueled with pipeline natural gas (as defined under 40 CFR §72.2 having no more than 0.5 gr TRS per 100 scf). Compliance can be demonstrated by the following: for pipeline natural gas, a current gas company bill. [OAC 252:100-43]

4. The permittee shall maintain records of operations as listed below. Such records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-43]

a. Records of emissions calculations for each source of emissions (monthly, 12-month rolling totals).
b. For the DX Generator, document each exothermic gas generation mode and the dates, start times, and durations of each process mode.

c. For the furnace, document each annealing process mode and the dates, start times, and durations of that process mode.
d. Document the dates, start times, durations of, and reasons for each bypass venting event.
e. Documents required by Specific Condition No. 1.b.ii.C.
f. Records of DX Generator differential pressure readings as required by Specific Condition No. 1.b.ii.D.
g. Records of inspections and calibration checks of DX Generator differential pressure measurement systems as required by Specific Condition No. 1.b.ii.E.
h. Initial compliance testing as required by Specific Condition No. 1.b.iii.
i. Periodic emissions testing as required by Specific Condition No. 1.b.iv.
j. Records as required by Specific Condition No. 1.c.ii. for hours of operation of the emergency generator(s).
k. The amounts of cleaning solvents, lubricants, corrosion inhibitors, paint, and inks, including amounts mixed, reclaimed, and disposed (monthly and 12-month rolling total) and associated emissions to demonstrate compliance with Specific Condition No. 1.d.i.
l. Records of the calculated daily weighted average VOC content of coatings used to demonstrate compliance with Specific Conditions No. 1.d.ii and 1.d.iv.
m. For each coating used, records identifying the coating type as defined under OAC 252:100-37-2 and OAC 252:100-39-46(b) to determine the applicable VOC emission limit under OAC 252:100-37-25(a) and OAC 252:100-39-46(d).
n. Current SDS or other manufacturers technical data for each cleaning solvents, lubricants, corrosion inhibitors, paint, inks, or other VOC containing material used at the facility which documents the VOC content, solids content, water content, density, exempt solvent(s) content(s), and the Hazardous Air Pollutant (HAP) content(s).
o. Records of the VOC emissions showing whether the facility VOC emissions from coatings are below the exemption level listed in OAC 252:100-37-25(c), 100 lbs per 24-hour day on a monthly average to show compliance with Specific Condition No. 1.d.iii.
p. The amounts of coatings and emissions calculations (monthly and 12-month rolling total) to demonstrate compliance with Specific Condition No. 1.d.vi.
q. Records of emissions calculations for the pickling tank as required by Specific Condition No. 1.g.ii.
r. Records of the cycle time and quantity of pipe processed (tons) for each cycle of the pickling tank operations.
s. Records of the acid concentration and iron concentration of the pickling tank operations.
t. Records showing each time and quantity of foaming inhibitor that is added to the pickling tank operations.
u. Initial testing of total dissolved solids (TDS) concentration (ppm) in the cooling tower water.
v. Maximum recirculation rate (gal/min) for the cooling tower.
w. Drift rate of the cooling tower.
x. Throughput and contents of the storage tank (monthly, 12-month rolling total).
y. Quantity of welding rod consumed, type of welding rod used, and HAP content of each welding rod type used.
z. For the fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 3.
aa. Records required by 40 CFR Part 60, Subpart JJJJ.

bb. Records required by 40 CFR Part 63, Subpart ZZZZ.
cc. Records required by 40 CFR Part 63, Subpart CCCCCC.
dd. Records required by OAC 252:100-39-42(a) for the parts washers.
ee. Records required by Specific Condition No. 5 to demonstrate compliance with OAC 252:100-8-36.2(c).
ff. Manufacturer's instructions for flame burner/tips of the flame curtains. Records demonstrating the flame burners/tips of the flame curtains are installed, operated, and maintained in accordance with manufacturer's instructions.

5. This facility is considered an existing Prevention of Significant Deterioration (PSD) facility. As such, the facility is subject to the provisions of OAC 252:100-8-36.2(c) for any project as defined therein. [OAC 252:100-8-36.2(c)]

6. To the extent this permit requires the permittee to record and/or maintain records, the same may be conducted in hardcopy or electronically as long as such records can be provided to DEQ personnel within a reasonable time following a request for the same.
[OAC 252:100-8-6(a)(7)(E)]

7. The following records shall be maintained on-site to verify Insignificant Activities. No recordkeeping is required for those operations that qualify as Trivial Activities.
[OAC 252:100-8-6(a)(3)(B)]

   a. Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature.
   b. Bulk gasoline or other fuel distribution with a daily average throughput less than 2,175 gallons per day, including dispensing, averaged over a 30-day period.
   c. Welding and soldering operations utilizing less than 100 pounds of solder and 53 tons per year of electrodes.
   d. Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant.

8. No later than 30 days after each anniversary date of the issuance of this Title V operating permit, the permittee shall submit to the Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit.
[OAC 252:100-8-6(c)(5)(A) & (D)]

9. This Part 70 operating permit replaces and supersedes all previous Air Quality operating permits for this facility, which are now canceled.

Webco Industries, Inc.
Attn: Clark Watson
P.O. Box 100
Sand Springs, OK 74063

SUBJECT: Permit No. **2021-0438-TV**
Webco Industries Star Center Tube
AQD Facility ID: 7898
13701 W Highway 51, Sand Springs, OK 74063
Section 16, Township 19N, Range 11E, Tulsa Oklahoma

Dear Mr. Watson,

Enclosed is the permit authorizing operation of the referenced facility. Please note that this permit is issued subject to the certain standards and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the submittal process should be referred to the Emissions Inventory Staff at (405) 702-4100.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or Joseph Wills, the permit writer, at Joseph.Wills@deq.ok.gov or (405) 702-4100.

Sincerely,

**DRAFT / PROPOSED**

Phillip Fielder, P.E.
Chief Engineer
**AIR QUALITY DIVISION**

Enclosures

# PART 70 PERMIT

**AIR QUALITY DIVISION**
**STATE OF OKLAHOMA**
**DEPARTMENT OF ENVIRONMENTAL QUALITY**
**707 NORTH ROBINSON, SUITE 4100**
**P.O. BOX 1677**
**OKLAHOMA CITY, OKLAHOMA 73101-1677**

## Permit No. 2021-0438-TV

**Webco Industries, Inc.,**

**having complied with the requirements of the law, is hereby granted permission to operate the Star Center Tube facility located at 13701 W Highway 51, Sand Springs, OK 74063, subject to the Standard Conditions dated June 21, 2016, and Specific Conditions, both of which are attached.**

**This permit shall expire five (5) years from the date below, except as authorized under Section VIII of the Standard Conditions.**

**DRAFT / PROPOSED**

**Kendal Stegmann, Division Director** **Date**
**AIR QUALITY DIVISION**

# Department of Environmental Quality (DEQ)
# Air Quality Division (AQD)
# Acronym List
# 9-10-21

| | |
|---|---|
| **ACFM** | Actual Cubic Feet per Minute |
| **AD** | Applicability Determination |
| **AFRC** | Air-to-Fuel Ratio Controller |
| **API** | American Petroleum Institute |
| **ASTM** | American Society for Testing and Materials |
| **BACT** | Best Available Control Technology |
| **BAE** | Baseline Actual Emissions |
| **BBL** | Barrel(s) |
| **BHP** | Brake Horsepower (bhp) |
| **BTU** | British thermal unit (Btu) |
| **C&E** | Compliance and Enforcement |
| **CAA** | Clean Air Act |
| **CAM** | Compliance Assurance Monitoring |
| **CAS** | Chemical Abstract Service |
| **CAAA** | Clean Air Act Amendments |
| **CC** | Catalytic Converter |
| **CCR** | Continuous Catalyst Regeneration |
| **CD** | Consent Decree |
| **CEM** | Continuous Emission Monitor |
| **CFC** | Chlorofluorocarbon |
| **CFR** | Code of Federal Regulations |
| **CI** | Compression Ignition |
| **CNG** | Compressed Natural Gas |
| **CO** | Carbon Monoxide or Consent Order |
| **COA** | Capable of Accommodating |
| **COM** | Continuous Opacity Monitor |
| **D** | Day |
| **DEF** | Diesel Exhaust Fluid |
| **DG** | Demand Growth |
| **DSCF** | Dry Standard (At Standard Conditions) Cubic Foot (Feet) |
| **EGU** | Electric Generating Unit |
| **EI** | Emissions Inventory |
| **EPA** | Environmental Protection Agency |
| **ESP** | Electrostatic Precipitator |
| **EUG** | Emissions Unit Group |
| **EUSGU** | Electric Utility Steam Generating Unit |
| **FCE** | Full Compliance Evaluation |
| **FCCU** | Fluid Catalytic Cracking Unit |
| **FESOP** | Federally Enforceable State Operating Permit |
| **FIP** | Federal Implementation Plan |
| **FR** | Federal Register |
| **GACT** | Generally Achievable Control Technology |
| **GAL** | Gallon (gal) |
| **GDF** | Gasoline Dispensing Facility |
| **GEP** | Good Engineering Practice |
| **GHG** | Greenhouse Gases |
| **GR** | Grain(s) (gr) |
| **$H_2CO$** | Formaldehyde |
| **$H_2S$** | Hydrogen Sulfide |
| **HAP** | Hazardous Air Pollutants |
| **HC** | Hydrocarbon |
| **HCFC** | Hydrochlorofluorocarbon |
| **HFR** | Horizontal Fixed Roof |
| **HON** | Hazardous Organic NESHAP |
| **HP** | Horsepower (hp) |
| **HR** | Hour (hr) |
| **I&M** | Inspection and Maintenance |
| **IBR** | Incorporation by Reference |
| **ICE** | Internal Combustion Engine |
| **LAER** | Lowest Achievable Emission Rate |
| **LB** | Pound(s) [Mass] (lb, lbs, lbm) |
| **LB/HR** | Pound(s) per Hour (lb/hr) |
| **LDAR** | Leak Detection and Repair |
| **LNG** | Liquefied Natural Gas |
| **LT** | Long Ton(s) (metric) |
| **M** | Thousand (Roman Numeral) |
| **MAAC** | Maximum Acceptable Ambient Concentration |
| **MACT** | Maximum Achievable Control Technology |
| **MM** | Prefix used for Million (Thousand-Thousand) |
| **MMBTU** | Million British Thermal Units (MMBtu) |
| **MMBTUH** | Million British Thermal Units per Hour (MMBtu/hr) |
| **MMSCF** | Million Standard Cubic Feet (MMscf) |
| **MMSCFD** | Million Standard Cubic Feet per Day |
| **MSDS** | Material Safety Data Sheet |
| **MWC** | Municipal Waste Combustor |
| **MWe** | Megawatt Electrical |
| **NA** | Nonattainment |
| **NAAQS** | National Ambient Air Quality Standards |
| **NAICS** | North American Industry Classification System |
| **NESHAP** | National Emission Standards for Hazardous Air Pollutants |

| | |
|---|---|
| **$NH_3$** | Ammonia |
| **NMHC** | Non-methane Hydrocarbon |
| **NGL** | Natural Gas Liquids |
| **$NO_2$** | Nitrogen Dioxide |
| **NOx** | Nitrogen Oxides |
| **NOI** | Notice of Intent |
| **NSCR** | Non-Selective Catalytic Reduction |
| **NSPS** | New Source Performance Standards |
| **NSR** | New Source Review |
| **$O_3$** | Ozone |
| **O&G** | Oil and Gas |
| **O&M** | Operation and Maintenance |
| **O&NG** | Oil and Natural Gas |
| **OAC** | Oklahoma Administrative Code |
| **OC** | Oxidation Catalyst |
| **PAH** | Polycyclic Aromatic Hydrocarbons |
| **PAE** | Projected Actual Emissions |
| **PAL** | Plant-wide Applicability Limit |
| **Pb** | Lead |
| **PBR** | Permit by Rule |
| **PCB** | Polychlorinated Biphenyls |
| **PCE** | Partial Compliance Evaluation |
| **PEA** | Portable Emissions Analyzer |
| **PFAS** | Per- and Polyfluoroalkyl Substance |
| **PM** | Particulate Matter |
| **$PM_{2.5}$** | Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers |
| **$PM_{10}$** | Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers |
| **POM** | Particulate Organic Matter or Polycyclic Organic Matter |
| **ppb** | Parts per Billion |
| **ppm** | Parts per Million |
| **ppmv** | Parts per Million Volume |
| **ppmvd** | Parts per Million Dry Volume |
| **PSD** | Prevention of Significant Deterioration |
| **psi** | Pounds per Square Inch |
| **psia** | Pounds per Square Inch Absolute |
| **psig** | Pounds per Square Inch Gage |
| **RACT** | Reasonably Available Control Technology |
| **RATA** | Relative Accuracy Test Audit |
| **RAP** | Regulated Air Pollutant or Reclaimed Asphalt Pavement |
| **RFG** | Refinery Fuel Gas |
| **RICE** | Reciprocating Internal Combustion Engine |
| **RO** | Responsible Official |
| **ROAT** | Regional Office at Tulsa |
| **RVP** | Reid Vapor Pressure |
| **SCC** | Source Classification Code |
| **SCF** | Standard Cubic Foot |
| **SCFD** | Standard Cubic Feet per Day |
| **SCFM** | Standard Cubic Feet per Minute |
| **SCR** | Selective Catalytic Reduction |
| **SDS** | Safety Data Sheet |
| **SER** | Significant Emission Rate |
| **SI** | Spark Ignition |
| **SIC** | Standard Industrial Classification |
| **SIP** | State Implementation Plan |
| **SNCR** | Selective Non-Catalytic Reduction |
| **$SO_2$** | Sulfur Dioxide |
| **SOx** | Sulfur Oxides |
| **SOP** | Standard Operating Procedure |
| **SRU** | Sulfur Recovery Unit |
| **T** | Tons |
| **TAC** | Toxic Air Contaminant |
| **TEG** | Triethylene Glycol |
| **THC** | Total Hydrocarbons |
| **TPY** | Tons per Year |
| **TRS** | Total Reduced Sulfur |
| **TSP** | Total Suspended Particulates |
| **TV** | Title V of the Federal Clean Air Act |
| **$\mu g/m^3$** | Micrograms per Cubic Meter |
| **US EPA** | U. S. Environmental Protection Agency |
| **VFR** | Vertical Fixed Roof |
| **VMT** | Vehicle Miles Traveled |
| **VOC** | Volatile Organic Compound |
| **VOL** | Volatile Organic Liquid |
| **VRT** | Vapor Recovery Tower |
| **VRU** | Vapor Recovery Unit |
| **YR** | Year |
| **2SLB** | 2-Stroke Lean Burn |
| **4SLB** | 4-Stroke Lean Burn |
| **4SRB** | 4-Stroke Rich Burn |

**MAJOR SOURCE AIR QUALITY PERMIT**
**STANDARD CONDITIONS**
**(June 21, 2016)**

## SECTION I. DUTY TO COMPLY

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.

[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

## SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements.

[OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.

[OAC 252:100-8-6(a)(3)(C)(iv)]

## SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

(1) the date, place and time of sampling or measurement;
(2) the date or dates analyses were performed;
(3) the company or entity which performed the analyses;
(4) the analytical techniques or methods used;
(5) the results of such analyses; and
(6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report. [OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions. [OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act. [OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards ("NSPS") under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants ("NESHAPs") under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer's instructions and in accordance with a protocol meeting the requirements of the "AQD Portable Analyzer Guidance" document or an equivalent method approved by Air Quality. [OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter ($PM_{10}$). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

## SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source. [OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." [OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.
[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

## SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification. [OAC 252:100-8-6(c)(6)]

## SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit. [OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit. [OAC 252:100-8-6(d)(2)]

## SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.
[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

## SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration.
[OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

## SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
[OAC 252:100-8-6 (a)(6)]

## SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege.
[OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

## SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing,

terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

[OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.

[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

## SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances: [OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

(1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
(2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
(3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
(4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d). [OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a “grandfathered source,” as defined under AQD rules. Such changes may require a permit modification.

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

## SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(17) for confidential information submitted to or obtained by the DEQ under this section):

(1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
(2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
(3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
(4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

## SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

(1) an emergency occurred and the permittee can identify the cause or causes of the emergency;

(2) the permitted facility was at the time being properly operated;
(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.
[OAC 252:100-8-6(a)(3)(C)(iv)]

## SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

## SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

(1) 5 tons per year of any one criteria pollutant.
(2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.
[OAC 252:100-8-2 and OAC 252:100, Appendix I]

## SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.
[OAC 252:100-8-2 and OAC 252:100, Appendix J]

## SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

(1) result in no net emissions increases,
(2) are not modifications under any provision of Title I of the federal Clean Air Act, and
(3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

## SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

(1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]

(2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]

(3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]

(a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
(b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
(c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
(d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.

(4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of

adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

(5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]

(6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]

(7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

**SECTION XX. STRATOSPHERIC OZONE PROTECTION**

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

(1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
(2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
(3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

(1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
(2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
(3) Persons performing maintenance, service, repair, or disposal of appliances must be

certified by an approved technician certification program pursuant to § 82.161;
(4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
(5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
(6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

## SECTION XXI. TITLE V APPROVAL LANGUAGE

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

(1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
(2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
(3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
(4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R.§ 70.8(a) and (c).
(5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
(6) The DEQ complies with 40 C.F.R. § 70.8(d).
(7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
(8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
(9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).

(10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

## SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [OAC 252:100-43-6]

Webco Industries, Inc.
Attn: Clark Watson
P.O. Box 100
Sand Springs, OK 74063

SUBJECT: Permit No. **2021-0438-TV**
Webco Industries Star Center Tube
AQD Facility ID: 7898
13701 W Highway 51, Sand Springs, OK 74063
Section 16, Township 19N, Range 11E, Tulsa Oklahoma

Dear Mr. Watson,

Air Quality has received the permit application for the referenced facility and completed initial review. This application has been determined to be a Tier II application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the application and draft permit include the following steps, which **you** must accomplish:

1. Publish at least one legal notice (one day) for the Notice of Tier II Draft Permit in at least one newspaper of general circulation within the county where the facility is located (Instructions enclosed);
2. Submit sample notices and provide the expected date of publication to **AQD 5 days prior to notice publishing**;
3. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility;
4. Send AQD a signed affidavit of publication for the notice(s) from Item #1 and Item #2 above within 20 days of publication. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E.
Chief Engineer
**AIR QUALITY DIVISION**

# NOTICE OF DRAFT PERMIT
# TIER II or TIER III AIR QUALITY PERMIT APPLICATION

**APPLICANT RESPONSIBILITIES**

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Note that if either the applicant or the public requests a public meeting, this must be arranged by the DEQ.

1. Complete the public notice using the samples provided by AQD below. Please use the version applicable to the requested permit action;
   Version 1 – Traditional NSR process for a construction permit
   Version 2 – Enhanced NSR process for a construction permit
   Version 3 – initial Title V (Part 70 Source) operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating a construction permit that followed Traditional NSR process
2. Determine appropriate newspaper local to facility for publishing;
3. Submit sample notice and provide date of publication to AQD 5 days prior to notice publishing;
4. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD.

**REQUIRED CONTENT** (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

**SAMPLE NOTICE** *(Italicized print is to be filled in by the applicant.)***:**

For initial Title V operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating requirements of a construction permit that followed Traditional NSR process.

**DEQ NOTICE OF TIER** *…II or III…* **DRAFT PERMIT**

**A Tier** *…II or III…* **application for an air quality** *…type of permit or permit action being sought (e.g., significant modification to a Title V permit or Title V/Title V renewal permit)…* **has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant,** *…name and address.*

**The applicant requests approval to** *…brief description of purpose of application…* **at the** *…site/facility name … …***[proposed to be] located at** *…physical address (if any), driving directions, and legal description including county….*

**In response to the application, DEQ has prepared a draft operating permit [modification] (Permit Number:** *…xxxx-xxxx-x…***), which may be reviewed at** *…locations (one must be in the county where the site/facility is located)…* **or at the Air Quality Division's main office (see address below). The draft permit is also available for review under Permits for Public Review on the DEQ Web Page: http://www.deq.ok.gov/**

**This draft permit would authorize the facility to emit the following regulated pollutants:** *(list each pollutant and amounts in tons per year (TPY))* [For facility modifications only, either add**: , which represents** (*identify the emissions change involved in the modification),* or add: **. The modification will not result in a change in emissions**]

**The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below or as directed through the corresponding online notice.** [Modifications only, add: **Only those issues relevant to the proposed modification(s) are open for comment.**] **A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ staff.**

**In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8.**

**If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45-day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j).**

**Information on all permit actions including draft permits, proposed permits, final issued permits and applicable review timelines are available in the Air Quality section of the DEQ Web page: http://www.deq.ok.gov/.**

**For additional information, contact** *…names, addresses and telephone numbers of contact persons for the applicant,* **or contact DEQ at: Chief Engineer, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.**

**Robert Singletary**
Executive Director

OKLAHOMA Environmental Quality

**Kevin Stitt**
Governor

Date: November 4, 2024

Cherokee Nation
Attn: Chuck Hoskin, Jr., Principal Chief
P.O. Box 948
Tahlequah, OK 74465

Re: Permit No. 2021-0438-TV
Webco Industries Star Center Tube (AQD Facility ID: 7898)
13701 W Highway 51, Sand Springs, OK 74063
Section 16, Township 19N, Range 11E, Tulsa Oklahoma
Date Received: October 4, 2021

Dear Mr. Hoskin:

The Oklahoma Department of Environmental Quality (DEQ), Air Quality Division (AQD), has received the Tier II/Tier III application referenced above. A Tier II/III application requires the facility provide a 30-day public comment period on the draft Tier II/III permit and a 20-day public comment period on a proposed Tier III permit at a public location within the county of the facility. The process requires the facility to notify the public by newspaper notice in a newspaper in the county of the proposed project. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to the newspaper notice.

Copies of draft permits and comment opportunities are also provided to the public on the Oklahoma DEQ website at the following location:

https://www.deq.ok.gov/air-quality-division/air-permits/public-participation-issued-permits/

If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.fielder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E.
Chief Engineer
**AIR QUALITY DIVISION**

Date: November 4, 2024

Muscogee Creek Nation
Attn: David Hill, Principal Chief
P.O. Box 580
Okmulgee, OK 74447

Re: Permit No. 2021-0438-TV
Webco Industries Star Center Tube (AQD Facility ID: 7898)
13701 W Highway 51, Sand Springs, OK 74063
Section 16, Township 19N, Range 11E, Tulsa Oklahoma
Date Received: October 4, 2021

Dear Mr. Hill:

The Oklahoma Department of Environmental Quality (Oklahoma DEQ), Air Quality Division (AQD), has received the Tier II/Tier III application referenced above. A Tier II/III application requires the facility provide a 30-day public comment period on the draft Tier II/III permit and a 20-day public comment period on a proposed Tier III permit at a public location within the county of the facility. The process requires the facility to notify the public by newspaper notice in a newspaper in the county of the proposed project. Since the proposed project falls within your Tribal jurisdiction, AQD is providing this direct notice. This letter notification is in addition to the newspaper notice.

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https://www.deq.ok.gov/air-quality-division/air-permits/public-participation-issued-permits/

If you prefer a copy of the draft and/or proposed permit, or direct notification by letter for any remaining public comment opportunities, if applicable, on the referenced permit action, please notify me by e-mail at phillip.fielder@deq.ok.gov, or by letter at:

Department of Environmental Quality, Air Quality Division
Attn: Phillip Fielder, Chief Engineer
707 N Robinson
Oklahoma City, OK, 73102

Thank you for your cooperation. If you have any questions, I can also be contacted at (405) 702-4185.

Sincerely,

Phillip Fielder

Phillip Fielder, P.E., Chief Engineer
**AIR QUALITY DIVISION**