

**STEEL PICKLING
INSPECTION CHECKLIST
40 C.F.R Part 63 Subpart CCC
Steel Pickling—HCl Process Facilities and Hydrochloric Acid Regeneration Plants
NESHAP**

NOTE: This checklist will establish whether a facility or operations within a facility are subject to and are in compliance with this NESHAP.

1. GENERAL INFORMATION

- A. Date of Inspection: _____
- B. Facility Name: _____
- C. Facility Address: _____
- D. Facility Contact: _____

(Name, Title, and Phone)

E. Inspector(s):		
Name	Title/Affiliation	Phone Number
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

- F. Is the facility a major or an area source? Major Area
(NESHAP applies to *major sources* only § 63.1155(a))

2. SOURCE IDENTIFICATION

- A. Does this facility engage in pickling carbon steel, which contains approximately 2 percent or less carbon, 1.65 percent or less manganese, 0.6 percent or less silicon, and 0.6 percent or less copper? Yes No **(If No, do not proceed, this rule does not apply [§ 63.1155(a)(3) & § 63.1156])**
- B. Does this facility pickle with hydrochloric acid that is at a concentration of 6 percent by weight or greater and has a temperature of 100° F or greater.? Yes No **(If Yes, this rule applies § 63.1155(a)(1))**
- C. Did the facility construct or reconstruct a steel pickling line and/or hydrochloric acid regeneration plant subject to this subpart that commenced construction or reconstruction after September 18, 1997? Yes No **(If Yes, that line and/or plant is a new source [§ 63.1160(a)(2)])**

3. NOTIFICATION AND REPORTING REQUIREMENTS (PRE-INSPECTION)

Citation	Requirement	Are Notifications and Reports Timely and Correct	
		Yes	No
§ 63.1163(a) & § 63.9(b)(2) Existing	Initial Notification submitted by Oct. 20, 1999		
§ 63.1163(a) & § 63.9(b)(3) New Sources	Initial Notification submitted no later than 120 days after initial startup.		
§ 63.1163(d) & § 63.9(d)	Notification in writing of intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin.		
§ 63.1163(e) & § 63.9(h)	The Notification of Compliance Status shall be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration performance test.		
§ 63.1164(a) & § 63.10(d)(2)	The results of a required performance test must be submitted before the close of business on the 60th day following the completion of the performance test.		
§ 63.1164 (c)(2) & § 63.10(d)(5)(i)	Thirty days following the end of each calendar half report actions which are consistent with the procedures specified in the startup, shutdown, and malfunction plan .		
§ 63.1164 (c)(3) & § 63.10(d)(5)(ii)	Report within 2 working days after commencing actions inconsistent with the plan start-up, shutdown, and malfunction plan .		

4. CONTROL DEVICES - WET SCRUBBERS WORK PRACTICE STANDARDS AND MAINTENANCE REQUIREMENTS

Citation	Requirement	Measurement, Calculation, or Observation	Does Facility Perform Indicated Operation?	
			Yes	No
§ 63.1160 (b)(2)(ii)	Follow the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps , in addition to exhaust system and scrubber fans and motors associated with those pumps and fans.			
§ 63.1160 (b)(2)(iii)	Clean the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling.			
§ 63.1160 (b)(2)(vi)(A)	Clean or replace (if necessary) any plugged spray nozzles or other liquid delivery devices.			
§ 63.1160 (b)(2)(vi)(B)	Repair or replacement of (if necessary) missing, misaligned, or damaged baffles, trays , or other internal components.			
§ 63.1160 (b)(2)(vi)(C)	Repair or replace (if necessary) droplet eliminator elements as needed.			
§ 63.1160 (b)(2)(vi)(D)	Repair or replace (if necessary) heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber.			
§ 63.1160 (b)(2)(1) § 63.6(e)(3)	Develop and implement a written startup, shut-down, and malfunction plan.			

5. **HYDROCHLORIC ACID REGENERATION PLANT AND MAINTENANCE REQUIREMENTS**

Citation	Requirement	Measurement, Calculation, or Observation	Does Facility Perform Indicated Operation?	
			Yes	No
§ 63.1160(b)(2)	Prepare an operation and maintenance plan for each emission control device which includes the following items in this table			
§ 63.1160(b)(3)(i)	Performance of the manufacturer's recommended maintenance at the recommended intervals on all required systems and components .			
§ 63.1160(b)(3)(ii)	Repair, replacement , or other corrective action within 1 working day of detection.			
§ 63.1160(b)(3)(iii)	Maintain a daily record, signed by a responsible maintenance official, showing the date of each inspection for each requirement, the problems found , a description of the repair, replacement, or other action taken , and the date of repair or replacement.			

6. **CONTROL DEVICE MONITORING REQUIREMENTS**

Citation	Requirement	Measurement, Calculation, or Observation	Does Facility Perform Indicated Operation?	
			Yes	No
§ 63.1160 (2)(b)(i)	Monitor and record the pressure drop across the scrubber once per shift while the scrubber is operating.			
§ 63.1160 (2)(b)(v)	The scrubber must be equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Administrator may be used.			
§ 63.1160 (2)(b)(vi)(E)	Adjust damper settings for consistency with the required air flow.			

Citation	Requirement	Measurement, Calculation, or Observation	Does Facility Perform Indicated Operation?	
			Yes	No
§ 63.1160 (2)(b)(vi)	Initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan.			
§ 63.1160 (2)(b)(vii)	Maintain a record of each inspection , including each item identified above, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken , and the date of the repair , replacement, or other corrective action taken.			
§ 63.1162 (a)(1)	Performance tests to measure the HCl mass flows at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in § 63.1161 of this subpart.			
§ 63.1162 (a)(1)	Performance tests shall be conducted either annually or according to an alternative schedule that is approved by the applicable permitting authority, but no less frequently than every 2 ½ years or twice per title V permit term.			
§ 63.1162 (a)(2)	If a wet scrubber is used as the emission control device, install, operate, and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. Flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating.			

Citation	Requirement	Measurement, Calculation, or Observation	Does Facility Perform Indicated Operation?	
			Yes	No
§ 63.1162 (a)(3)	If an emission control device other than a wet scrubber is used, install, operate, and maintain systems for the measurement and recording of the appropriate operating parameters .			
§ 63.1162 (a)(5)	Each monitoring device must be certified by the manufacturer to be accurate to within 5 percent .			
§ 63.1162 (a)(5)	Each monitoring device must be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year .			

7. HYDROCHLORIC ACID REGENERATION PLANT MONITORING REQUIREMENTS

Citation	Requirement	Measurement, Calculation, or Observation	Does Facility Perform Indicated Operation?	
			Yes	No
§ 63.1162 (b)(1)	The process offgas temperature , shall be monitored continuously and recorded at least once every shift while the facility is operating in production mode			
§ 63.1162 (b)(2)	Proportion of excess air shall be determined and recorded at least once every shift while the plant is operating in production mode.			
§ 63.1162 (b)(3)	Each monitoring device must be certified by the manufacturer to be accurate to within 5 percent .			
§ 63.1162 (b)(3)	Each monitoring device must be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year .			

Citation	Requirement	Measurement, Calculation, or Observation	Does Facility Perform Indicated Operation?	
			Yes	No
§ 63.1162 (b)(4)	Operation of the plant with the process offgas temperature lower than the value established during performance testing or with the proportion of excess air greater than the value established during performance testing is a violation of the operational standard specified in § 63.1159(a) of this subpart.			

8. **HYDROCHLORIC ACID STORAGE VESSEL MONITORING REQUIREMENTS**

Citation	Requirement	Measurement, Calculation, or Observation	Does Facility Perform Indicated Operation?	
			Yes	No
§ 63.1162 (c)	Inspect each hydrochloric acid storage vessel semiannually to determine that the closed-vent system and either the air pollution control device or the enclosed loading and unloading line , whichever is applicable, are installed and operating when required.			