April 29, 1996

NOTE

To: Jim Turner, RTI

From: Jim Maysilles, EPA

Subject: Small businesses in the pickling industry

I have recently completed phone calls to all companies that reportedly employed 100 or fewer people. We now have a definitive list of four companies that have fewer than 100 employees, as follows:

Granite City Pickling and Warehousing, Inc. (#51)
Home office: Toledo, OH
26 employees 419-531-4657

Riverdale Plating and Heat treating, Inc. (#134)
Riverdale, IL
50 employees 312-568-2400

Midway Wire, Inc. (#125)
Chicago, IL
55 employees 312-767-2500

Baily Engineers (#136)
Fairfield, AL
70 employees Contact: 412-745-6200 Jack Barcelona

Based on reported information, it appears to me that the Bailey Engineers operation would meet the proposed emission standard. Therefore, only three companies that employ fewer than 100 people may be impacted by the rule in terms of new or upgraded equipment required. More detailed information about these operations may reveal if they are already capable of meeting the standard or would not be subject to it because they are not major sources of hydrochloric acid.

Attached is a revised table giving the number of employees in each company that operates a pickling or acid regeneration operation.

Employee Information

Number of employees in company	Facility ID No.
26	51
50	134
55	125
70	136
100	11
100	34
100	60
101-250	7
	21
	24
	33
	42
	50
	100
	110
	116
	126
251-500	1
	2
	3
	14
	23
	80
	85
	108
	112
501-750	117
	124
750-1000	4
	28
	122
1001-1500	9
	26
	54
	102
	114
> 1500	5
	6
	8
	12
	16
	17
	18
	20
	22
	27
	29
	30
	35
	36
	37
> 1500	39
	40
	43
	44
	47
	48
	53
	56
	57
	58
	81
	86
	101
	105
	106
	111
	113
	123
	127
	132
	133
	135
Not known but > 100	59
	118

Totals:

1-100:	7	501-750:	2	> 1500:	37
101-250:	10	750-1000:	3	Not known but > 100:	2
251-500:	9	1001-1500:	5		

Notes: Fourteen companies operate multiple facilties, 39 in all: Allied Tube and Conduit (9, 103), American Spring Wire (14, 52), Armco (20, 31, 49), Bethlehem (27, 32, 45, 46, 109), Carpenter Technology (37, 38), Heidtman (28, 107), Inland (40, 131), LTV (12, 15, 83), National Standard (26, 41, 119), Paulo Products (108, 120), Sherman Wire (50, 55, 84), U. S. Steel (127, 128, 129, 130), Wheeling Pittsburgh (5, 10, 82, 121), and Worthington (101, 115).

Operations 19, 25, and 104 were discontinued after the survey was made and are not included in the above table.

NEW SCRUBBER AND SCRUBBER UPGRADE REQUIREMENTS PROJECTED FOR THE STEEL PICKLING INDUSTRY

Process type and size	Facility ID no.	Line capacity, 1,000 tons/year	New scrubber needed	Scrubber upgrade needed
Continuous coil, small	122	(363)		X
		(206)	X	
	116	237	X	
	111	710	X	
	46	500		X
	31	274	X	
	121	450	X	
	82	379	X	
		266	X	
		101	X	
Continuous coil, medium	17	650		X
		400		X
	36	1,400		X
	45	750		X
	86	390		X
		308		X
		104	X	
	5	1,270	X	

Process type and size	Facility ID no.	Line capacity, 1,000 tons/year	New scrubber needed	Scrubber upgrade needed
Continuous coil, large	114	1,580		X
	47	1,400		X
		800		X
	49	1,330		X
		1,330		X
	133	600		X
		600		X
		700		X
	15	750	X	
		750	X	
	109	1,700		X
		1,700		X
	12	1,800	X	
		1,290	X	
	127	C		X
	129	C		X
		C		X
	128	C		X
Push-pull coil, small	81	307		X
	3	245		X
	* 51	250		X
	117	300		X
Push-pull coil, medium	No new controls or upgrades required.			
Push-pull coil, large	No new controls or upgrades required.			

Process type and size	Facility ID no.	Line capacity, 1,000 tons/year	New scrubber needed	Scrubber upgrade needed
Continuous rod/wire, small	21	10	X	
	118	0.673 x 4	X	
		0.673 x 3	X	
Continuous rod/wire, medium	135	13.2		X
	8	9.2		X
	119	35		X
		35		X
		7.5		X
	16	10 + 10 + 4.3	X	
	18	60.6	X	
		36.1 + 19.8	X	
	27	36 + 10.8 + 10.8	X	
	32	52	X	
	113	12.7 + 12.7 + 6.2	X	
		10.6	X	
Continuous rod/wire, large	58	36.9	X	
		(29.8 x 3) + 31.5	X	
		18.9 + 15.3	X	
		10.8 + 9	X	
Continuous tubing, small	126	35 + 35		X
	103	80.7 + 55.8		X
	7	40	X	
Continuous tubing, large	9	156		X
		83	X	
		53 + 52	X	
		43 + 35	X	

Process type and size	Facility ID no.	Line capacity, 1,000 tons/year	New scrubber needed	Scrubber upgrade needed
Batch, small	34	15	X	
		15	X	
	37	25		X
	120	1.5 + 1.5	X	
	30	7.5 + 4.4 + 3.5	X	
	41	8.8	X	
	42	(3.6 x 3) + 7.2	X	
	50	7.5 + 0.6	X	
	53	11.5	X	
	55	6.3 + 2.6	X	
	59	30	X	
	84	12.5	X	
	108	10 + 4 + 0.6	X	
	110	5.8 x 3	X	
		5.8 x 3	X	
	* 134	8.3 + 4.5 + 3.2 + 2.1	X	

Process type and size	Facility ID no.	Line capacity, 1,000 tons/year	New scrubber needed	Scrubber upgrade needed
Batch, medium	52	75	X	
	1	100	X	
	22	88	X	
	54	81	X	
	56	50.1 + 3.1	X	
	80	56	X	
Batch, large	* 125	78.5		X
		58.8		X
	27	54 + 54	X	
		54 + 54	X	

Process type and size	Facility ID no.	Line capacity, 1,000,000 gallons/year	New scrubber needed	Scrubber upgrade needed
Acid regeneration, small	11	3.15	X	
	117	3.5		X
Acid regeneration, medium	No new controls or upgrades required.			
Acid regeneration, large	47	10.25		X
		10.25		X
		10.25		X

NOTES:

Line capacity numbers in parentheses are actual production rates; capacities were not reported.

Costs of scrubbers and upgrading will be based on costs determined for model plants.

Facilities identified by an asterisk (*) are operated by companies fewer than 100 employees.

C - Line capacity is confidential information. Assume 1,400,000 tons/year for cost determination.