



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
MONTGOMERY COUNTY  
Application No: 08-02453**

**CERTIFIED MAIL**

**DATE:** 3/22/2001

Hohman Plating & Mfg Inc  
Connie Bramel  
814 Hillrose Avenue  
Dayton, OH 45404

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

RAPCA



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 08-02453**

Application Number: 08-02453  
APS Premise Number: 0857040217  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Hohman Plating & Mfg Inc  
Person to Contact: Connie Bramel  
Address: 814 Hillrose Avenue  
Dayton, OH 454041199

Location of proposed air contaminant source(s) [emissions unit(s)]:

**814 Hillrose Ave  
Dayton, Ohio**

Description of proposed emissions unit(s):

**Acid zinc plating; barrel pretreatment and processing; administrative modification to PTI 08-02453 issued April 7, 1993.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements Related to Monitoring and Record keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or Record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and Record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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**Facility ID: 0857040217**

**PTI Application: 08-02453**

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V

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permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit..

#### 14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

#### 15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

### B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

#### SUMMARY (for informational purposes only) TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
ammonium chloride	0.60
zinc chloride	0.07
cobalt chloride	0.001
hydrochloric acid	0.07
sulfuric acid	0.13

Emissions Unit ID: P030

hydrofluoric acid	0.01
hydroxide compounds	0.026
nickel compounds	0.07

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P030 - Acid zinc plating system No. 4 (modification)	OAC rule 3745-31-05(A)(3)	0.14 lb/hour and 0.60 TPY ammonium chloride (as particulates)
		0.000321 lb/hour and 0.001 TPY cobalt chloride (as particulates)
		0.02 lb/hour and 0.07 TPY zinc chloride (as particulates)
	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- The lb/hour and TPY emission limitations were developed for PTI purposes to reflect the

**Hohm**

**PTI A**

Emissions Unit ID: **P030**

**Issued: To be entered upon final issuance**

potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

**B. Operational Restrictions**

None

**C. Monitoring and/or Record keeping Requirements**

None

**D. Reporting Requirements**

None

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation -  
0.14 lb/hour ammonium chloride (as particulates)

Applicable Compliance Method -

Compliance is based upon the maximum hourly amount of ammonium chloride added to the tanks, assuming a 100% loss.

- b. Emission Limitation -  
0.60 TPY ammonium chloride (as particulates)

Applicable Compliance Method -

The 0.60 TPY emission limitation was developed by multiplying the 0.14 lb/hour emission rate by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- c. Emission Limitation -  
0.02 lb/hour zinc chloride (as particulates)

Applicable Compliance Method -

Compliance is based upon the maximum hourly amount of zinc chloride added to the

tanks, assuming a 100% loss.

- d. Emission Limitation -  
0.07 TPY zinc chloride (as particulates)

Applicable Compliance Method -

The 0.07 TPY emission limitation was developed by multiplying the 0.02 lb/hour emission rate by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- e. Emission Limitation -  
0.000321 lb/hour cobalt chloride (as particulates)

Applicable Compliance Method -

Compliance is based upon the maximum hourly amount of cobalt chloride added to the tanks, assuming a 100% loss.

- f. Emission Limitation -  
0.001 TPY cobalt chloride (as particulates)

Applicable Compliance Method -

The 0.001 TPY emission limitation was developed by multiplying the 0.000321 lb/hour emission rate by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- g. Emission Limitation -  
20% opacity, as a six-minute average

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with the procedures specified in OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

## F. Miscellaneous Requirements

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**PTI A**

Emissions Unit ID: **P030**

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1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P032 - Barrel pretreatment system No. 6 (modification)	OAC rule 3745-31-05(A)(3)	0.005 lb/hour and 0.02 TPY hydrochloric acid
	OAC rule 3745-17-07(A)(1)	0.03 lb/hour and 0.13 TPY sulfuric acid
	OAC rule 3745-17-11(B)(1)	0.003 lb/hour and 0.01 TPY hydrofluoric acid  Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 1 inch of water at all times while the emissions unit is in operation.

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2. The pH of the scrubber liquor shall be maintained within the range of 5 to 10.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall properly install, operate, and maintain equipment to continuously monitor the static pressure drop across the scrubber and the pH of the scrubber liquor while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
2. The permittee shall collect and record the following information each day:
  - a. The pressure drop across the scrubber, in inches of water.
  - b. The pH of the scrubber liquor.
  - c. A log of the downtime for the capture (collection) system, control device, or monitoring equipment when the associated emissions unit was in operation.

**D. Reporting Requirements**

1. In accordance with Section A.2. of the General Terms and Conditions of this permit, the permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the static pressure drop across the scrubber and/or the scrubber liquor pH were not maintained at or above the required levels.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation -  
0.005 lb/hour hydrochloric acid  
  
Applicable Compliance Method -  
Compliance with this allowable emission rate shall be determined by multiplying the

Emissions Unit ID: P032

maximum amount of hydrochloric acid solution added to the tanks in one hour by the maximum concentration of HCl (36%) and a gassing rate of 10%. This uncontrolled emission rate shall then be multiplied by a scrubber control efficiency of 90% (1 - 0.90). Ongoing compliance shall be based upon the established operating parameters for the packed bed scrubber control system.

- b. Emission Limitation -  
0.02 TPY hydrochloric acid

Applicable Compliance Method -

The 0.02 TPY emission limitation was developed by multiplying the 0.005 lb/hour emission rate by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- c. Emission Limitation -  
0.03 lb/hour sulfuric acid (as particulates)

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum amount of sulfuric acid added to the tanks in one hour by a gassing rate of 10% and a scrubber control efficiency of 90% (1 - 0.90). Ongoing compliance shall be based upon the established operating parameters for the packed bed scrubber control system.

- d. Emission Limitation -  
0.13 TPY sulfuric acid (as particulates)

Applicable Compliance Method -

The 0.13 TPY emission limitation was developed by multiplying the 0.03 lb/hour emission rate by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- e. Emission Limitation -  
0.003 lb/hour hydrofluoric acid (as particulates)

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum amount of hydrofluoric acid added to the tanks in one hour by a gassing rate of 10% and a scrubber control efficiency

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of 90% (1 - 0.90). Ongoing compliance shall be based upon the established operating parameters for the packed bed scrubber control system.

- f. Emission Limitation -  
0.01 TPY hydrofluoric acid (as particulates)

Applicable Compliance Method -

The 0.01 TPY emission limitation was developed by multiplying the 0.003 lb/hour emission rate by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- g. Emission Limitation -  
20% opacity, as a six-minute average

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with the procedures specified in OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

**F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P033 - Barrel processing system No. 7 (modification)	OAC rule 3745-31-05(A)(3)	0.06 lb/hour and 0.26 TPY hydroxide compounds (as particulates)
		0.0158 lb/hour and 0.07 TPY nickel compounds (as particulates)
		0.01 lb/hour and 0.05 TPY hydrochloric acid
	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The lb/hour and TPY emission limitations were developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

**B. Operational Restrictions**

**Hohm**

**PTI A**

Emissions Unit ID: **P033**

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None

**C. Monitoring and/or Record keeping Requirements**

None

**D. Reporting Requirements**

None

**E. Testing Requirements**

**1.** Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation -  
0.06 lb/hour hydroxide compounds (as particulates)

Applicable Compliance Method -  
Compliance shall be determined by multiplying the maximum amount of hydroxide compounds added to the tanks in one hour by a gassing rate of 10%.

- b. Emission Limitation -  
0.26 TPY hydroxide compounds (as particulates)

Applicable Compliance Method -  
The 0.26 TPY emission limitation was developed by multiplying the 0.06 lb/hour emission rate by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- c. Emission Limitation -  
0.0158 lb/hour nickel compounds (as particulates)

Applicable Compliance Method -  
Compliance shall be determined by multiplying the maximum amount of nickel compounds added to the tanks in one hour by a gassing rate of 2%.

- d. Emission Limitation -

**Hohm**

**PTI A**

Emissions Unit ID: **P033**

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0.07 TPY nickel compounds (as particulates)

Applicable Compliance Method -

The 0.07 TPY emission limitation was developed by multiplying the 0.0158 lb/hour emission rate by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- e. Emission Limitation -  
0.01 lb/hour hydrochloric acid

Applicable Compliance Method -

Compliance with this allowable emission rate shall be determined by multiplying the maximum amount of hydrochloric acid solution added to the tanks in one hour by the maximum concentration of HCl (36%) and a gassing rate of 10%.

- f. Emission Limitation -  
0.05 TPY hydrochloric acid

Applicable Compliance Method -

The 0.05 TPY emission limitation was developed by multiplying the 0.01 lb/hour emission rate by a maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

- g. Emission Limitation -  
20% opacity, as a six-minute average

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with the procedures specified in OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

**F. Miscellaneous Requirements**

Emissions Unit ID: **P033**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.