

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

1/23/2014

Certified Mail

Mr. Frank Simcic
TIER Environmental, LLC (dba Hukill Environmental)
7013 Krick Rd
Bedford, OH 44146-4493

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318030172
Permit Number: P0115886
Permit Type: Administrative Modification
County: Cuyahoga

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: CDAQ



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
TIER Environmental, LLC (dba Hukill Environmental)**

Facility ID: 1318030172
Permit Number: P0115886
Permit Type: Administrative Modification
Issued: 1/23/2014
Effective: 1/23/2014
Expiration: 2/28/2017



Division of Air Pollution Control
Permit-to-Install and Operate
for
TIER Environmental, LLC (dba Hukill Environmental)

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Authorization

Facility ID: 1318030172
Application Number(s): M0002499
Permit Number: P0115886
Permit Description: Administrative modification to P016. The associated scrubber is being modified to use a caustic scrubber liquor and an unassociated emissions unit is being added to the scrubber. The addition of the new equipment to the scrubber will not increase the particulate emissions from the scrubber stack associated with this emissions unit.
Permit Type: Administrative Modification
Permit Fee: \$500.00
Issue Date: 1/23/2014
Effective Date: 1/23/2014
Expiration Date: 2/28/2017
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

TIER Environmental, LLC (dba Hukill Environmental)
7013 Krick Rd
Bedford, OH 44146

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

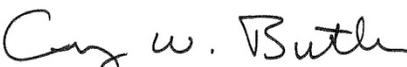
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Interim Director



Final Permit-to-Install and Operate
TIER Environmental, LLC (dba Hukill Environmental)
Permit Number: P0115886
Facility ID: 1318030172
Effective Date: 1/23/2014

Authorization (continued)

Permit Number: P0115886

Permit Description: Administrative modification to P016. The associated scrubber is being modified to use a caustic scrubber liquor and an unassociated emissions unit is being added to the scrubber. The addition of the new equipment to the scrubber will not increase the particulate emissions from the scrubber stack associated with this emissions unit.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P016
Company Equipment ID:	HF Process
Superseded Permit Number:	P0109932
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
TIER Environmental, LLC (dba Hukill Environmental)
Permit Number: P0115886
Facility ID: 1318030172
Effective Date: 1/23/2014

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
TIER Environmental, LLC (dba Hukill Environmental)
Permit Number: P0115886
Facility ID: 1318030172
Effective Date: 1/23/2014

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
TIER Environmental, LLC (dba Hukill Environmental)
Permit Number: P0115886
Facility ID: 1318030172
Effective Date: 1/23/2014

C. Emissions Unit Terms and Conditions



1. P016, HF Process

Operations, Property and/or Equipment Description:

Dedicated hydrofluoric acid filling line controlled by a packed bed tower scrubber.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d., b)(2)a., c)(1) through c)(7), d)(1), d)(2), e)(2) and f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 13-04099 issued 5/13/2003 and PTIO P0109932, issued 4/24/2012)	Particulate emissions (hydrofluoric acid) shall not exceed 0.313 lb/hr. Visible particulate emissions from any stack shall not exceed 5% opacity, as a six minute average.
b.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-11	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(D)(1)(b) FEPTIO to avoid Title V	Particulate emissions (PE/HAP) shall not exceed 0.16 ton as a rolling, 12-month summation. See b)(2)a. and c)(1) below.

(2) Additional Terms and Conditions

- a. The emissions from P016 shall be vented to the packed bed scrubber control device with an overall control efficiency of 95% for particulate emissions at all times when this emissions unit is in operation, including all times when the acid is being mixed and/or cut.

c) Operational Restrictions

- (1) The maximum operating hours of the acid blending process shall not exceed 1,000 hours per rolling, 12-month period.
- (2) The static pressure drop across the scrubber shall be continuously maintained at a value not less than 1 or more than 3 inches of water across the packing while this emissions unit is in operation.
- (3) The scrubber liquid flow rate shall be maintained at a value not less than 15 or more than 25 gallons per minute.
- (4) The scrubber water pressure shall be continuously maintained at 1.5 psi.
- (5) The pH of the scrubber liquor shall be continuously maintained within the range of 12.0 to 14.0.
- (6) The permittee shall 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 the exhaust system, scrubber fans, and motors associated with those pumps and fans.
- (7) The scrubber internals and mist eliminators shall be cleaned at intervals sufficient to prevent buildup of solids or other fouling.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day:
 - a. the pressure drop across the scrubber, in inches of water, on a once-per-shift basis;
 - b. the scrubber water flow rate, in gallons per minute, on a once-per-shift basis;



- c. the scrubber liquor pH on a once-per-shift basis;
 - d. the scrubber water pressure, in pounds per square inch (psi), on a once-per-shift basis; and
 - e. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
- (2) The permittee shall properly operate and maintain equipment to monitor the static pressure drop across the scrubber (in inches of water), the scrubber liquor pH, the scrubber water flow rate (in gallons per minute) and the scrubber water pressure (in psi) for the scrubber employed for this emissions unit, on an hourly basis, while this emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and the time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of the deviations, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determined that a corrective action is not necessary and documents the reason(s) for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time during which there was a deviation;
- j. the pressure drop, scrubber liquor pH, scrubber water flow rate, and scrubber water pressure readings immediately after the corrective action(s) was/were implemented; and



k. the name(s) of the personnel who performed the work.

Investigations and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it determined that a malfunction has occurred.

The range(s) and/or limit(s) for the pressure drop, scrubber liquor pH, scrubber water flow rate, and scrubber water pressure limits are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ) or the appropriate Ohio EPA District Office. The permittee may request revisions to the permitted range or limit for the pressure drop, scrubber liquor pH, scrubber water flow rate, and scrubber water pressure based upon information obtained during future performance tests that demonstrate compliance with the established PE emission rates for this emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

Emission limitations: 0.16 ton HAP emissions per rolling, 12-month summation

Operational Limitations: Static pressure drop of 1 to 3 inches across the scrubber

Scrubber water flow rate of 15 to 25 gallons per minute

process limited to 1,000 hours of operation per rolling, 12-month summation

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).



If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Cleveland DAQ

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) The permittee shall identify the following information in the annual permit evaluation report:
 - a. each period of time (start time and date, and end time and date) when the pressure drop, scrubber liquor pH, scrubber water flow rate, and scrubber water pressure was/were outside of the appropriate range or exceeded the appropriate limit established in this permit;
 - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;
 - c. each incident described above in "a" or "b" where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" or "b" where prompt corrective action(s), that would bring the pressure drop, scrubber liquor pH, scrubber water flow rate, and scrubber water pressure into compliance with the acceptable range was determined to be necessary and were not taken; and
 - e. each incident of deviation described above in "a" or "b" where proper records were not maintained for the investigation and/or corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
Particulate emissions (hydrofluoric acid as a HAP) shall not exceed 0.313 lb/hr.



Applicable Compliance Method(s):

Stack testing performed in 2004 showed an emission rate of 0.15 lb HF/hr. Information provided by the permittee identified a maximum scrubber loading rate of 6.25 lbs HF/hr with an overall control efficiency of 95% resulting in an emission rate of 0.313 lb HF/hr.

If required, compliance with the mass emission limitation shall be determined by performing a stack test using US EPA test methods 1-4 and 26 of 40 CFR Part 60, Appendix A.

b. Emissions Limitation:

Particulate emissions (hydrofluoric acid as a HAP) shall not exceed 0.16 ton per rolling 12-month summation.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission limit by 1000 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the hourly limitation and the annual hours of operation limitation.

c. Emissions Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9.

g) **Miscellaneous Requirements**

- (1) Five hydrofluoric acid blend/cut tanks (Company identification numbers TK - 101, TK - 102, TK - 103, TK - 104, TK - 105) associated with emissions unit P016 were not required to obtain a permit to install. Tanks TK-101, TK-102, TK-104, and TK-105 are exempt from permitting requirements via OAC rule 3745-31-03(I). Tank TK-103 is exempt from permitting requirements via OAC rule 3745-15-05.
- (2) The five hydrofluoric acid blend/cut tanks (Company identification numbers (TK - 101, TK- 102, TK - 103, TK - 104, TK - 105) are used exclusively for emissions unit P016.
- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO prior to making a "modification" as defined by OAC rule



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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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.