

Facility ID: 0857040217 Issuance type: Final State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0857040217 Emissions Unit ID: P021 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Strip copperplated parts, System C (Tanks: AK.EP.TL.828, CN.EP.CU.829, CN.ST.CU.836, CN.ST.EN.835, and CN.EP.CU.025)	OAC rule 3745-31-05(A)(3) PTI 08-2436	The cyanide compounds from this emissions unit shall not exceed 0.49 pound per hour (lb/hr) and 2.14 tons per year (TPY).
		The copper from this emissions unit shall not exceed 0.05 lb/hr and 0.22 TPY.
		The tin from this emissions unit shall not exceed 0.38 lb/hr and 1.66 TPY.
		The hydroxide compounds from this emissions unit shall not exceed 0.23 lb/hr and 1.01 TPY.
	OAC rule 3745-17-11(B)(1)	The requirements established pursuant to this rule also includes compliance with the requirements of OAC rule 3745-17-07(A)(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).
	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- (a) The 0.49 lb/hour cyanide compounds, 0.05 lb/hour copper, 0.38 lb/hour tin, and 0.23 lb/hour hydroxide compounds emission limitations were established 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

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the amount of cyanide compounds, copper, tin, and hydroxide compounds were employed in the strip tanks of this emissions unit.
2. The permit to install for this emissions unit (P021) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):
Pollutant: hydroxide compounds

TLV (mg/m3): 1.474

Maximum Hourly Emission Rate (lbs/hr): 0.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9.164

MAGLC (ug/m3): 35

3. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- D. **Reporting Requirements**
 1. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.
- 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):

Emission Limitation -
0.49 lb/hour cyanide compounds

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum amount of cyanide compounds added to the tanks in one hour by the company developed loss factor of 20% (1 - 0.80).

Emission Limitation -
2.14 TPY cyanide compounds

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the monthly cyanide compounds usage records for the calendar year multiplied by a company developed loss factor of 20% (1 - 0.80), divided by 2,000 pounds per ton.

Emission Limitation -
0.05 lb/hour copper

Applicable Compliance Method -
Compliance shall be based upon the maximum amount of copper added to the tanks in one hour, assuming a 100% loss.

Emission Limitation -
0.22 TPY copper

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the monthly copper usage records for the calendar year, divided by 2,000 pounds per ton.

Emission Limitation -
0.38 lb/hour tin

Applicable Compliance Method -
Compliance shall be based upon the maximum amount of tin added to the tanks in one hour, assuming a 100% loss.

Emission Limitation -
1.66 TPY tin

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the monthly tin usage records for the calendar year, divided by 2,000 pounds per ton.

Emission Limitation -
0.23 lb/hour hydroxide compounds (as particulates)

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

Emission Limitation -
1.01 TPY hydroxide compounds (as particulates)

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the monthly hydroxide compound usage records for the calendar year, divided by 2,000 pounds per ton.

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

Applicable Compliance Method -

Compliance shall be determined through visible emission evaluations performed using the methods and procedures specified in Reference Method 9 of 40 CFR Part 60, Appendix A, and 40 CFR 60.675(c).

F. **Miscellaneous Requirements**

1. None