

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: P022 Issuance type: Final State Permit To Operate

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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 and post-treatment system D, with packed bed scrubber control (Tanks: AC.AP.NA.518, AC.AP.NA.846, AC.AP.PM.502, AC.AP.PM.843, AC.SF.CR.796, AC.SF.DW.100, AC.SF.PS.182, AC.ST.CU.858, AC.ST.PS.791, AK.ST.CU.832, MU.SF.XX.795, AC.AP.NA.010, and NT.PW.CW.011)	OAC rule 3745-31-05(A)(3) PTI 08-3320	The nitric acid from this emissions unit shall not exceed 0.216 pound per hour (lb/hour) and 0.675 ton per year (TPY).
		The chromic acid from this emissions unit shall not exceed 0.0005 lb/hour and 0.0016 TPY.
		The hydrochloric acid from this emissions unit shall not exceed 0.03 lb/hour and 0.13 TPY.
		The sulfuric acid from this emissions unit shall not exceed 0.0424 lb/hour and 0.133 TPY.
	OAC rule 3745-17-11(B)(1)	The sodium hydroxide from this emissions unit shall not exceed 0.014 lb/hour and 0.043 TPY.
	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). Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- (a) The 0.216 lb/hr nitric acid, 0.0005 lb/hr chromic acid, 0.03 lb/hr hydrochloric acid, 0.0424 lb/hr sulfuric acid, and 0.014 lb/hr sodium hydroxide emissions 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 this limit.

B. Operational Restrictions

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 0.25 inch of water at all times while the emissions unit is in operation.
2. The pH of the scrubber liquor shall be maintained within a range of 5 to 10 at all times while this emissions unit is in operation.
3. The scrubber water flow rate shall be continuously maintained at a value of not less than 3 gallons per minute at all times while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber, the pH of the scrubber liquor, and the scrubber water flow rate while the 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.
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. The scrubber water flow rate, in gallons per minute.
- d. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the scrubber.
 - b. The pH of the scrubber liquor.
 - c. The scrubber water flow rate.

These quarterly deviation (excursion) reports shall be submitted to the Director (the appropriate District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during the calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.

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 -
0.216 lb/hour nitric acid (as particulates)
 - Applicable Compliance Method -
Compliance with this allowable emission rate was demonstrated in a performance test conducted on November 18, 1997 with results showing an average nitric acid emission rate of 0.023 lb/hour. Ongoing compliance shall be based upon the established operating parameters for the packed bed scrubber control system.
 - Emission Limitation -
0.675 TPY nitric acid (as particulates)
 - Applicable Compliance Method -
The 0.675 TPY emission limitation was developed by multiplying the maximum hourly emission rate by a maximum annual operating schedule and dividing by 2,000 pound per ton.
 - Emission Limitation -
0.0005 lb/hour chromic acid (as particulates)
 - Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum amount of chromic acid added to the tank in one hour by a gassing rate of 10% (0.10) 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.
 - Emission Limitation -
0.0016 TPY chromic acid (as particulates)
 - Applicable Compliance Method -
The 0.0016 TPY emission limitation was developed by multiplying the 0.0005 lb/hour emission rate by a maximum annual operating schedule and dividing by 2,000 pound per ton..
 - Emission Limitation -
0.03 lb/hour hydrochloric acid
 - Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum amount of hydrochloric acid solution added to the tank in one hour by a maximum hydrochloric acid concentration of 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.
 - Emission Limitation -
0.13 TPY hydrochloric acid
 - Applicable Compliance Method -
The 0.13 TPY emission limitation was developed by multiplying the 0.03 lb/hour emission rate by a maximum annual operating schedule and dividing by 2,000 pound per ton..
 - Emission Limitation -
0.0424 lb/hour sulfuric acid (as particulates)
 - Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum amount of sulfuric acid added to the tank in one hour by a gassing rate of 10% (0.10) 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.
 - Emission Limitation -
0.133 TPY sulfuric acid (as particulates)
 - Applicable Compliance Method -
The 0.133 TPY emission limitation was developed by multiplying the 0.0424 lb/hour emission rate by a maximum annual operating schedule and dividing by 2,000 pound per ton..
 - Emission Limitation -
0.014 lb/hour sodium hydroxide (as particulates)
 - Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum amount of sodium hydroxide added to the tank in

one hour by a gassing rate of 10% (0.10).

Emission Limitation -
0.043 TPY sodium hydroxide (as particulates)

Applicable Compliance Method -

The 0.043 TPY emission limitation was developed by multiplying the 0.014 lb/hour emission rate by a maximum annual operating schedule and dividing by 2,000 pound 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