



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

12/28/2015

Certified Mail

Mark Mellum  
 GFS CHEMICALS INC  
 851 MCKINLEY AVE  
 COLUMBUS, OH 43222

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125040109  
 Permit Number: P0118954  
 Permit Type: OAC Chapter 3745-31 Modification  
 County: Franklin

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Columbus Dispatch. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall and Ohio EPA DAPC, Central District Office  
 Permit Review/Development Section 50 West Town Street, 6th Floor  
 Ohio EPA, DAPC P.O. Box 1049  
 50 West Town Street Suite 700 Columbus, OH 43216-1049  
 PO Box 1049  
 Columbus, Ohio 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael E. Hopkins, P.E.  
 Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification  
 Ohio EPA-CDO



## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

GFS Chemicals Inc. (GFS) submitted an application to modify their acid production process (emissions unit P001). Emissions unit P001 is being modified because a key raw material is no longer available. This process still feeds Acid Bays 2, 3 and 4 (emissions units P002, P007 and P008) which are not affected by this change. In addition to the modifications to P001, GFS will be installing several ancillary storage tanks that are permit exempt pursuant to OAC rule 3745-31-03(A)(1)(I)(vii). Emissions from P001 will be vented to two existing wet scrubbers.

3. Facility Emissions and Attainment Status:

GFS is located in Franklin County. Franklin County is currently in marginal non-attainment for the 2008 eight-hour ozone standard.

GFS has requested federally enforceable limitations to avoid classification as a major source under Title V and MACT. The synthetic minor strategy includes venting HAP emissions to wet scrubbers with 98% control efficiencies. The appropriate monitoring, recordkeeping and reporting requirements have been established in order to demonstrate the applicable Title V and MACT thresholds are not exceeded.

4. Source Emissions:

Emissions unit P001 is the source of acid gas emissions from two mixing reactors, stage 1 distillation and stage 2 concentration. The stage 1 distillation and stage 2 concentration steps utilize condensers that are integral to the process to recover product. The condensers recover 80% of the acid gases. Emissions from the two mixing reactors (B02R23 and B02R24) vent to the existing North Mezzanine wet scrubber, shared by emissions units P005, P020 and P022. Emissions from the stage 1 distillation (B08R10, B08T08 and B08T09) and stage 2 concentration (B08R11) vent to the Bay 1 scrubber, dedicated to emissions unit P001. The wet scrubbers are designed to control acid gas emissions by 98%. The acid gas emissions include hydrochloric acid (HCl), a hazardous air pollutant identified in Section 112(b) of Title III of the Clean Air Act. The uncontrolled potential HCl emissions (i.e., after any integral condenser) and controlled potential HCl emissions (i.e., after any integral condenser and after the federally enforceable wet scrubber) are provided in Table 1 below.

Table 1: Potential HCl Emissions from P001

	Uncontrolled HCl Emissions (ton/yr)	Controlled HCl Emissions (ton/yr)
Transfer of raw materials to reactors B02R23 and B02R24	6.87	0.14
Mixing in reactors B02R23 and B02R24	0.62	0.01
Transfer from tanks B08T07 and B08T11 to stage 1 distillation vessel B08R10	0.66	0.01
Stage 1 distillation in B08R10 and transfer of acid to tanks B08T08 and B08T09	1.55	0.03
Transfer of acid to stage 2 concentration vessel B08R11 and stage 2 concentration in B08R11	1.42	0.03
TOTAL	11.12	0.22

5. Conclusion:

The issuance of P0118954 is recommended.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
HCl	0.22

## PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: [HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate OAC Chapter 3745-31 Modification  
GFS CHEMICALS INC

879 MCKINLEY AVE., COLUMBUS, OH 43222

ID#:P0118954

Date of Action: 12/28/2015

Permit Desc:Chapter 31 modification for changes to an acid production process.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Alexandria Fair, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
GFS CHEMICALS INC**

Facility ID:	0125040109
Permit Number:	P0118954
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	12/28/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
GFS CHEMICALS INC**

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**Draft Permit-to-Install and Operate**

GFS CHEMICALS INC

**Permit Number:** P0118954

**Facility ID:** 0125040109

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

## Authorization

Facility ID: 0125040109  
Application Number(s): A0046374, A0053945, A0054254  
Permit Number: P0118954  
Permit Description: Chapter 31 modification for changes to an acid production process  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$500.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 12/28/2015  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

GFS CHEMICALS INC  
879 MCKINLEY AVE  
COLUMBUS, OH 43222

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:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

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  
Director



**Draft Permit-to-Install and Operate**

GFS CHEMICALS INC

**Permit Number:** P0118954

**Facility ID:** 0125040109

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

## Authorization (continued)

Permit Number: P0118954

Permit Description: Chapter 31 modification for changes to an acid production process

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

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	ACID PLANT B08R08
Superseded Permit Number:	01-08841
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
GFS CHEMICALS INC  
**Permit Number:** P0118954  
**Facility ID:** 0125040109  
**Effective Date:** To be entered upon final issuance

## **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 Ohio EPA DAPC, Central District Office 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.



**Draft Permit-to-Install and Operate**  
GFS CHEMICALS INC  
**Permit Number:** P0118954  
**Facility ID:** 0125040109  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



**Draft Permit-to-Install and Operate**

GFS CHEMICALS INC

**Permit Number:** P0118954

**Facility ID:** 0125040109

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

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.



**Draft Permit-to-Install and Operate**  
GFS CHEMICALS INC  
**Permit Number:** P0118954  
**Facility ID:** 0125040109  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. P001, ACID MANUFACTURING PLANT**

**Operations, Property and/or Equipment Description:**

Acid manufacturing process, including 2 mixing reactors, stage 1 distillation and stage 2 concentration

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. b)(1)b. and b)(2)c.

(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)a., b)(2)a., b)(2)b., d)(1), d)(2), e)(2), f)(1)a . 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(D) [Federally enforceable limitations to avoid Title V and MACT]	Hydrochloric acid (HCl) emissions shall not exceed 0.22 tons per rolling, 12-month period.  See b)(2)a. and b)(2)b. below.
b.	ORC 3704.03(F)(3)(c) and F(4) [Toxic Air Contaminant Statute]	See b)(2)c. below.

(2) Additional Terms and Conditions

a. The HCl emissions limitation was established to reflect the potential to emit for this emissions unit taking into consideration the associated control equipment. The monitoring, recordkeeping and reporting requirements for the control equipment as established in the following terms and conditions are sufficient to demonstrate compliance with this limitation.

- b. The HCl emissions from the two mixing reactors (B02R23 and B02R24), stage 1 distillation (B08R10, B08T08 and B08T09) and stage 2 concentration (B08R11) associated with this emissions unit shall be vented to a scrubber at all times the emissions unit is in operation. The HCl control efficiency of the scrubber shall be at least 98%, by weight.
  - c. 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 a permittee to apply for and obtain a new or modified permit 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit.
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range or limit for the pressure drop across the scrubber, the liquid flow rate, and the liquid pH shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.
  - (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in inches of water, gauge), the scrubber liquid flow rate (in gallons per minute), and the scrubber liquid pH during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid's pH and flow rate once per shift while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

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 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 a deviation, 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 determines that corrective action is not necessary and documents the reasons 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 (in minutes) during which there was a deviation;
- j. the pressure drop, flow rate, and pH readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

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

These range(s) and/or limit(s) for the pressure drop, liquid flow rate, and pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. The permittee may request revisions to the permitted range or limit for the pressure drop, liquid flow rate, or pH based upon information obtained during future performance tests that demonstrate compliance with the HCl control efficiency requirement for this/these emissions unit(s). 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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District

Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (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:
    - i. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, the liquid flow rate, or the liquid pH was/were outside of the appropriate range or exceeded the applicable limit contained in this permit;
    - ii. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
  - 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 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 director (the Central District Office).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Emissions Limitation:

Hydrochloric acid (HCl) emissions shall not exceed 0.22 tons per rolling, 12-month period.

Applicable Compliance Method:

This emissions limitation was established to reflect the controlled potential to emit based on the information provided in the permit application.

Compliance shall be determined based on venting the emissions to a scrubber at all times the emissions unit is in operation and maintaining the scrubber in accordance with the monitoring and/or recordkeeping requirements in d)(1) and d)(2) above.

b. Emissions Limitation:

The HCl emissions from the two mixing reactors (B02R23 and B02R24), stage 1 distillation (B08R10, B08T08 and B08T09) and stage 2 concentration (B08R11) associated with this emissions unit shall be vented to a scrubber at all times the emissions unit is in operation. The HCl control efficiency of the scrubber shall be at least 98%, by weight.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the HCl control efficiency requirement in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26A.

g) Miscellaneous Requirements

(1) None.