Ohio Environmental Protection Agency

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

1/12/2016

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Morrey LaBelle
Charter Steel
6255 US Route 23
Risingsun, OH 43457

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0387000376
Permit Number: P0120043
Permit Type: Administrative Modification
County: Wood

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI 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 Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Indiana; Canada

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Charter Steel

Facility ID:	0387000376
Permit Number:	P0120043
Permit Type:	Administrative Modification
Issued:	1/12/2016
Effective:	1/12/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Charter Steel

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Authorization

Facility ID:	0387000376
Facility Description:	Metal Heat Treating and Cold Finishing of Steel Shapes.
Application Number(s):	A0054755
Permit Number:	P0120043
Permit Description:	Administrative Modification to remove mass emission limits and allow for an alternative scrubber operating scenario.
Permit Type:	Administrative Modification
Permit Fee:	$500.00
Issue Date:	1/12/2016
Effective Date:	1/12/2016

This document constitutes issuance to:

Charter Steel
6255 U.S. Highway 23 South
Risingsun, OH 43457

of a Permit-to-Install 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0120043
Permit Description: Administrative Modification to remove mass emission limits and allow for an alternative scrubber operating scenario.

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

Emissions Unit ID:	**P001**
Company Equipment ID:	Pickling Line #1
Superseded Permit Number:	P0115476
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P013**
Company Equipment ID:	Pickling Line #2
Superseded Permit Number:	P0115476
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) 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 information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) 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.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to theOhio EPA DAPC, Northwest District Officein accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) 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 appropriate Ohio EPA District Office or contracted

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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping 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 Ohio EPA DAPC, Northwest District Office. 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, 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.)

10. 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)not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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 permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted,no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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 operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be <u>obtained before</u>operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services"facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed.The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. P001, Pickling Line #1

Operations, Property and/or Equipment Description:

Pickling Line #2 with Wet Scrubber System

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

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)	See b)(2)a.
b.	40 CFR Part 63, Subpart CCC (40 CFR Part 63.1155 – 63.1166)	18 parts per million, by volume, (ppmv) of hydrogen chloride (HCl) See b)(2)b.
c.	40 CFR Part 63, Subpart A	Table 1 to 40 CFR, Part 63, Subpart CCC – Applicability of General Provisions to Subpart CCC shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) are not applicable to the HCl emitted from these emissions units. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. HCl is an air contaminant that does not involve an established NAAQS.

The potential to emit for this emissions unit is 53.4 tons HCl/year. Potential emissions were determined by summing the emissions from the four scrubbers. The emissions from each scrubber were determined by converting the limit of 18 ppmv of HCl from 40 CFR, Part 63, Subpart CCC based on a scrubber exhaust flow rate of 35,000 scfm, a scrubber exhaust temperature of 344 degrees Kelvin.

b. The permittee has chosen to demonstrate compliance with 40 CFR, Part 63.1158(a)(2)(i) by employing four scrubbers. The HCl concentration in the exhaust gases from the scrubbers shall not exceed 18 ppmv.

c) Operational Restrictions

(1) The emissions from the pickling line shall be vented to a wet scrubber system at all times the emissions unit is in operation. This system will typically consist of the operation of four wet scrubbers, with the exception of periods of time where one scrubber is not in operation for maintenance activities. In and of itself, the operation of the pickling line using three scrubbers will not be considered a malfunction under OAC rule 3745-15-06. These events shall be documented under the recordkeeping requirements of condition d)(2) below.

(2) In accordance with 40 CFR, Part 63.6(e), the permittee shall operate the emissions unit, including the associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all times, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practical after their occurrence in accordance with the startup, shutdown and malfunction plan [See Section g)(3)].

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 each scrubber, the scrubber liquid flow rate for each scrubber and the scrubber liquid pH for each scrubber shall be based upon the latest performance stack testing results. The appropriate range for each parameter established to demonstrate compliance is as follows:

Parameters	Acceptable range for each scrubber
Scrubber liquid pH	5.5 – 12.0
Scrubber water makeup flow rate (gallons per minute)	1 (minimum)
Pressure drop (inches of water)	5.5 – 9.0
Scrubber liquid recirculation rate (gallons per minute)	100 (minimum)

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across each scrubber (in inches of water), the scrubber liquid flow rate (in gallons per minute), the scrubber water makeup flow rate (in gallons per minute) and the scrubber liquid pH for each scrubber during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber, the scrubber water makeup flow rate for each scrubber and the scrubber liquid pH for each scrubber on a once per shift basis. 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, the scrubber liquid flow rate, the scrubber water makeup flow rate and the scrubber liquid 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.

(3) These ranges and/or limits for the pressure drop, the scrubber liquid flow rate, the scrubber water makeup flow rate and the scrubber liquid pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop, the scrubber liquid flow rate, the scrubber water makeup flow rate or the scrubber pH based upon information

obtained during future performance tests that demonstrate compliance with the allowable HCl emission rate 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 a minor permit modification of the Title V permit.

(4) In accordance with 40 CFR, Part 63.10(b)(2), the permittee shall maintain records of the following information and retain the records for 5 years from the date of each record:

a. The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

b. The occurrence and duration of each malfunction of the air pollution control equipment;

c. All maintenance performed on the air pollution control equipment;

d. Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;

e. All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see 40 CFR, Part 63.10(b)(2)(v));

f. All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;

g. All results of initial or subsequent performance tests;

h. If the permittee has been granted a waiver from record keeping or reporting requirements under 40 CFR, Part 63.10(f), any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements;

i. The permittee has been granted a waiver from the initial performance test under 40 CFR, Part 63.7(h), a copy of the full request and the Administrator's approval or disapproval;

j. All documentation supporting initial notifications and notifications of compliance status required by 40 CFR, Part 63.9;

k. Records of any applicability determination, including supporting analyses and

l. The records for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

(5) The permittee shall keep the written operations and maintenance plan [See g)(3)] on record after it is developed to be made available for inspection, upon request by the Director, for the life of the facility. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Director for a period of 5 years after each revision to the plan.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber, the scrubber water makeup flow rate for each scrubber or the liquid pH for each scrubber was outside of the appropriate range or limit specified 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 of deviation described in e)(1)a. or e)(1)b. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(1)a. or e)(1)b. where prompt corrective action, that would bring the pressure drop, the scrubber liquid flow rate or the scrubber liquid pH into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in e)(1)a. or e)(1)b. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(2) In accordance with 40 CFR, Part 63.10(d)(5)(i), if actions taken by the permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the permittee, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.

(3) Any time an action taken by a permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of 40 CFR, Part 63.10(d)(5)(ii).

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emissions testing shall be conducted in accordance with the frequency specified in the facilities Title V permit (P0114976 issued 1/29/14).

b. The emission testing shall be conducted to demonstrate compliance with the allowable outlet concentration for HCl.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationery Sources-Isokinetic Method." The minimum sampling time for each run shall be 60 minutes and the minimum sample volume shall be 0.85 dry standard cubic meters (30 dry standard cubic feet).

d. The concentrations of HCl shall be calculated for each run as follows:

C1HCl (ppmv) = 0.659 C2HCl (mg/dscm)

where:

C1HCl (ppmv) = the concentration of HCl, in ppmv

C2HCl (mg/dscm) = the concentration of HCl, in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A

0.659 = conversion factor

The permittee may use equivalent alternative measurement methods approved by the Director.

e. Compliance with the applicable concentration standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.

f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower

emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

g. During emission testing, the permittee shall also record the following information across each scrubber:

i. the pH range for the scrubbing liquid;

ii. the scrubber water flow rate, in gallons/minute;

iii. the scrubber liquid recirculation rate, in gallons/minute; and

iv. the scrubber pressure drop range.

h. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission test(s).

i. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

j. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

(2) 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. <u>Emission Limitations:</u> HCl emissions shall not exceed 18 ppmv

<u>Applicable Compliance Method:</u> Compliance with the allowable outlet concentration shall be based upon the results of emission testing conducted in accordance with the testing requirements specified in condition f)(1) above.

g) Miscellaneous Requirements

(1) In delegating implementation and enforcement authority to a State under 40 CFR, Part 63, Subpart E, the following authorities shall be retained by the Administrator and not transferred to a State:

a. Approval of alternative emission standards to those standards specified in 40 CFR, Part 63.1157 and 63.1158.

b. Approval of alternative measurement methods for HCl to those specified in 40 CFR, Part 63.1161(d)(1).

c. Approval of alternative monitoring requirements to those specified in 40 CFR, Part 63.1162(a)(2) through 63.1162(a)(5) and 40 CFR Part 63.1162(b)(1) through 63.1162(b)(3).

d. Waiver of record keeping requirements specified in 40 CFR, Part 63.1165.

The following authorities shall be delegated to State: All other authorities, including approval of an alternative schedule for conducting performance tests to the requirement specified in 40 CFR, Part 63.1162(a)(1).

(2) In accordance with 40 CFR, Part 63.6(e)(3), the permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.

(3) The permittee shall comply with the operation and maintenance requirements in 40 CFR, Part 63.6(e). In addition to these requirements, the permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the Title V permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

a. Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance.

b. Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans.

c. Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling.

d. Require an inspection of each scrubber at intervals of no less than 3 months with:

i. Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices.

ii. Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components.

iii. Repair or replacement of droplet eliminator elements as needed.

iv. Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber.

v. Adjustment of damper settings for consistency with the required air flow.

e. If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternative means of inspection approved by the Administrator may be used.

f. The permittee shall initiate procedures for corrective action within 1 working day of detection of any operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan.

g. The permittee shall maintain a record of each inspection, including each item identified in condition g)(3)d., that is signed by the responsible maintenance official and that shows the date of each inspection, the problem that was identified, and a description of the repair, replacement or other corrective action taken.

2. P013, Pickling Line #2

Operations, Property and/or Equipment Description:

Pickling Line #2 with Wet Scrubber System

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

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), as effective 11/30/01	See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
c.	40 CFR, Part 63, Subpart CCC (40 CFR Part 63.1155 – 63.1166)	18 parts per million, by volume, (ppmv) of hydrogen chloride (HCl) See b)(2)c.
d.	40 CFR 63.1 - 15 (40 CFR Part 63.1155)	Table 1 to 40 CFR, Part 63, Subpart CCC – Applicability of General Provisions to Subpart CCC shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

BAT requirements under OAC rule 3745-31-05(A)(3) are not applicable to the HCl emitted from these emissions units. BAT is only applicable to emissions of an air contaminant or precursor of an air contaminant for which a national ambient air quality standard (NAAQS) has been adopted under the Clean Air Act. HCl is an air contaminant that does not involve an established NAAQS.

The potential to emit for this emissions unit is 53.4 tons HCl/year. Potential emissions were determined by summing the emissions from the four scrubbers. The emissions from each scrubber were determined by converting the limit of 18 ppmv of HCl from 40 CFR, Part 63, Subpart CCC based on a scrubber exhaust flow rate of 35,000 scfm, a scrubber exhaust temperature of 344 degrees Kelvin.

c. The permittee has chosen to demonstrate compliance with 40 CFR, Part 63.1158(a)(2)(i) by employing four scrubbers. The HCl concentration in the exhaust gases from the scrubbers shall not exceed 18 ppmv.

c) Operational Restrictions

(1) The emissions from the pickling line shall be vented to a wet scrubber system at all times the emissions unit is in operation. This system will typically consist of the operation of four wet scrubbers, with the exception of periods of time where one scrubber is not in operation for maintenance activities. In and of itself, the operation of the pickling line using three scrubbers will not be considered a malfunction under OAC rule 3745-15-06. These events shall be documented under the recordkeeping requirements of condition d)(2) below.

(2) In accordance with 40 CFR, Part 63.6 (e), the permittee shall operate the emissions unit, including the associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all times, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practical after their occurrence in accordance with the startup, shutdown and malfunction plan [See Section g)(3)].

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 each scrubber, the scrubber liquid flow rate for each scrubber and the scrubber liquid pH for each scrubber shall be based upon the latest performance stack testing results. The appropriate range for each parameter established to demonstrate compliance is as follows:

Parameters	Acceptable range for each scrubber
Scrubber liquid pH	5.5 – 12.0

Scrubber water makeup flow rate (gallons per minute)	1 (minimum)
Pressure drop (inches of water)	5.5 – 9.0
Scrubber liquid recirculation rate (gallons per minute)	100 (minimum)

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across each scrubber (in inches of water), the scrubber liquid flow rate for each scrubber (in gallons per minute) and the scrubber liquid pH for each scrubber during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber and the scrubber liquid pH for each scrubber on a once per shift basis. 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. The acceptable pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber and the scrubber liquid pH for each scrubber 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.

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, the scrubber liquid flow rate and the scrubber liquid 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 ranges and/or limits for the pressure drop, the scrubber liquid flow rate and the scrubber liquid pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop, the scrubber liquid flow rate or the scrubber pH based upon information obtained during future performance tests that demonstrate compliance with the allowable HCl emission rate 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 a minor permit modification of the Title V permit.

(3) In accordance with 40 CFR, Part 63.10 (b)(2), the permittee shall maintain records of the following information and retain the records for 5 years from the date of each record:

a. The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

b. The occurrence and duration of each malfunction of the air pollution control equipment;

c. All maintenance performed on the air pollution control equipment;

d. Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;

e. All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see 40 CFR, Part 63.10 (b)(2)(v));

f. All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent

performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;

g. All results of initial or subsequent performance tests;

h. If the permittee has been granted a waiver from record keeping or reporting requirements under 40 CFR, Part 63.10 (f), any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements;

i. the permittee has been granted a waiver from the initial performance test under 40 CFR, Part 63.7 (h), a copy of the full request and the Administrator's approval or disapproval;

j. All documentation supporting initial notifications and notifications of compliance status required by 40 CFR, Part 63.9;

k. Records of any applicability determination, including supporting analyses and

l. The records for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

(4) The permittee shall keep the written operations and maintenance plan [See g)(3)] on record after it is developed to be made available for inspection, upon request by the Director, for the life of the facility. In addition, if the operation and maintenance plan is revised, the permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Director for a period of 5 years after each revision to the plan.

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 the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across each scrubber, the scrubber liquid flow rate for each scrubber or the scrubber liquid pH for each scrubber was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range for each parameter following any required compliance demonstration;

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 of deviation described in e)(2)a. or e)(2)b. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)a. or e)(2)b. where prompt corrective action, that would bring the pressure drop, the scrubber liquid flow rate or the scrubber liquid pH into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in e)(2)a. or e)(2)b. where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(3) In accordance with 40 CFR, Part 63.10 (d)(5)(i), if actions taken by the permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the permittee shall state such information in a semiannual report. The report, to be certified by the permittee, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half.

(4) Any time an action taken by a permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the permittee shall comply with all requirements of 40 CFR, Part 63.10 (d)(5)(ii).

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emissions testing shall be conducted in accordance with the frequency specified in the facilities Title V permit (P0114976 issued 1/29/14).

b. The emission testing shall be conducted to demonstrate compliance with the allowable outlet concentration for HCl.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationery Sources-Isokinetic Method." The minimum sampling time for each run shall be 60 minutes and the minimum sample volume shall be 0.85 dry standard cubic meters (30 dry standard cubic feet).

d. The concentrations of HCl shall be calculated for each run as follows:

C1HCl (ppmv) = 0.659 C2HCl (mg/dscm)

where: C1HCl (ppmv) = the concentration of HCl, in ppmv

C2HCl (mg/dscm) = the concentration of HCl, in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A

0.659 = conversion factor

The permittee may use equivalent alternative measurement methods approved by the Director.

e. Compliance with the applicable concentration standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.

f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.

g. During emission testing, the permittee shall also record the following information:

   i. the pH range for the scrubbing liquid;

   ii. the scrubber water flow rate, in gallons/minute; and

   iii. the scrubber pressure drop range.

h. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission test(s).

i. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

j. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the

test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

(2) Compliance with the emissions limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: 18 ppmv of HCl

Applicable Compliance Method: Compliance with the allowable emission limitation above shall be based upon the results of emission testing conducted in accordance with f)(1) above.

g) Miscellaneous Requirements

(1) In delegating implementation and enforcement authority to a State under 40 CFR, Part 63, Subpart E, the following authorities shall be retained by the Administrator and not transferred to a State:

a. Approval of alternative emission standards to those standards specified in 40 CFR, Part 63.1157 and 63.1158.

b. Approval of alternative measurement methods for HCl to those specified in 40 CFR, Part 63.1161(d)(1).

c. Approval of alternative monitoring requirements to those specified in 40 CFR, Part 63.1162(a)(2) through 63.1162 (a)(5) and 63.1162 (b)(1) through 63.1162 (b)(3).

d. Waiver of record keeping requirements specified in 40 CFR, Part 63.1165.

The following authorities shall be delegated to State: All other authorities, including approval of an alternative schedule for conducting performance tests to the requirement specified in 40 CFR, Part 63.1162 (a)(1).

(2) In accordance with 40 CFR, Part 63.6 (e)(3), the permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.

(3) The permittee shall comply with the operation and maintenance requirements in 40 CFR, Part 63.6 (e). In addition to these requirements, the permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the Title V permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

a. Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance.

b. Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans.

c. Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling.

d. Require an inspection of each scrubber at intervals of no less than 3 months with:

   i. Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices.

   ii. Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components.

   iii. Repair or replacement of droplet eliminator elements as needed.

   iv. Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber.

   v. Adjustment of damper settings for consistency with the required air flow.

e. If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternative means of inspection approved by the Administrator may be used.

f. The permittee shall initiate procedures for corrective action within 1 working day of detection of any operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan.

g. The permittee shall maintain a record of each inspection, including each item identified in condition g)(3)d., that is signed by the responsible maintenance official and that shows the date of each inspection, the problem that was identified, and a description of the repair, replacement or other corrective action taken.