

Facility ID: 1318104347 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

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

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

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

Facility ID: 1318104347 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 Push-pull pickling line controlled with 2 packed tower scrubbers	OAC Rule 3745-31-05(A)(3) (PTI 13-2974)	Particulate emissions shall not exceed 0.01 gr/dscf, 0.81 lb/hr, and 3.53 TPY.
	OAC Rule 3745-17-07 (A) (1)	Visible particulate emissions from the exhaust stack shall not exceed 5 percent opacity, as a six minute average, except as provided by rule.
	OAC Rule 3745-17-11 (B)	The requirements of this rule are equal to or less stringent than the requirements found in OAC Rule 3745-31-05 (A)(3). The requirements of this rule are equal to or less stringent than the requirements found in OAC Rule 3745-31-05 (A)(3).

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The pH of the scrubber liquor shall be continuously maintained between 0.5 and 2.0 while this emissions unit is in operation.
2. The pressure drop across the scrubber shall be continuously maintained between 2.0 and 6.0 inches water at all times while this emissions unit is in operation.
3. The scrubber water flow rate shall be continuously maintained at a value of not less than 300 gallons per minute at all times while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the pH of the scrubber liquor while the emissions unit is in operation. The pH monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information each day:
 The pH of the scrubber liquor once per shift.
 A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2. The permittee shall properly install, operate, and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information each day:
 The pressure drop across the scrubber, in inches of water, once per shift.
 The scrubber water flow rate, in gallons per minute, once per shift.
 The operating times for the capture (collection) system, control device, monitoring equipment, and the

associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the scrubber pressure drop did not comply with the manufacturers requirements as specified above. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the scrubber water flow rate did not comply with the manufacturers requirements as specified above. Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation: Particulate emissions shall not exceed 0.01 gr/dscf and 0.81 lbs/hour.

Applicable Compliance Method:

i. If required, compliance with the hourly particulate emission limitation shall be determined in accordance with the test methods and procedures in Method 5 of 40 CFR Part 60, Appendix A. Alternative US EPA approved test methods may be used with prior approval from the Ohio EPA.

ii. If required, the testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or the Local Air Agency.

iii. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification which 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 District Office's or Local Air Agency's refusal to accept the results of the emission test(s).

iv. Personnel from the appropriate Ohio EPA District Office or Local Air Agency 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 from 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.

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

Emission Limitation: 3.53 TPY TSP

Applicable Compliance Method:

Compliance shall be determined by multiplying the emission factor of 0.81 lb/hr (or more recent factor obtained from a stack test) by the number of hours of operation per year and divided by 2000 (conversion from pounds to tons).

Emission Limitation: Visible particulate emissions shall not exceed 5 percent opacity, as a six minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the above visible particulate emission limitation shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

1. None