

Facility ID: 1431423307 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: 1431423307 Emissions Unit ID: P001 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>
P001 - Fabrication Cleaning Line Controlled with a Scrubber	OAC rule 3745-31-05(A)(3) (PTI 14-05403)	Nitric acid emissions shall not exceed 2.12 lbs/hr and 9.29 TPY.
		Particulate emissions (PM) and particulate emissions 10 microns and less (PM10) shall not exceed 2.22 lbs/hr and 9.72 TPY.
	OAC rule 3745-17-11(B)(1)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B)(1) and 3745-17-07(A)(1).
	OAC rule 3745-17-07(A)(1)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See term A.2.a.

2. **Additional Terms and Conditions**
  - (a) Visible particulate emissions from the scrubber exhaust stacks shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.  
The hourly and annual emission limitations outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.  
Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a wet scrubber and the emission limitations.

**B. Operational Restrictions**

1. The pH of the scrubber liquor shall be maintained at a minimum value of 5.0 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 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:

- a. The pH of the scrubber liquor, on a daily basis (the continuous chart recorder will meet this requirement).
- b. A log or record of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2. The permit to install for this emissions unit (P001) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the

use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: nitric acid

TLV (ug/m3): 5,200

Maximum Hourly Emission Rate (lbs/hr): 2.12

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46.5

MAGLC (ug/m3): 123.8

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

**D. Reporting Requirements**

1. The permittee shall submit pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the requirements specified in term B.1.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from the scrubber exhaust stacks shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Nitric acid emissions shall not exceed 2.12 lbs/hr and 9.29 TPY.

Applicable Compliance Method:

Compliance with the nitric acid emission limitations in this permit is determined in accordance with the calculations provided by the facility in the application for PTI 14-05403 as received on February 19, 2003.

c. Emission Limitation:

Particulate emissions (PM) and particulate emissions 10 microns and less (PM10) shall not exceed 2.22 lbs/hr and 9.72 TPY.

Applicable Compliance Method:

Compliance with the PM/PM10 emission limitations in this permit is determined in accordance with the calculations provided by the facility in the application for PTI 14-05403 as received on February 19, 2003. If required, compliance shall be determined through tests performed in accordance with 40 CFR Part 60, Appendix A, Method 5.

2. Compliance with the pH limitation in term B.1. shall be demonstrated by the recordkeeping requirements specified in term C.1.

**F. Miscellaneous Requirements**

1. None