

Facility ID: 1483140150 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: 1483140150 Emissions Unit ID: F006 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>
F006-Concrete panel acid/water wash with Hydroblast Sprayer	OAC rule 3745-31-05(A)(3) PTI 14-04347	Hydrochloric acid (HCl) emissions shall not exceed 6.3 pounds per hour and 3.2 tons per year. See Terms A.2.a and A.2.b. See Sections B.1 and B.2.
	OAC rule 3745-17-07(B) OAC rule 3745-17-08(B)	See term A.2.d. See term A.2.e.

2. Additional Terms and Conditions

- (a) Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average. The permittee shall maintain the application of HCl in a water spray. The pounds per hour HCl emissions limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with this emission limitation. This emission unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e). This emission unit is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

B. Operational Restrictions

1. The permittee shall not employ muriatic acid in emissions unit F006 with an HCl content greater than 31.5% by weight.
2. The permittee shall not employ more than 20,700 gallons of muriatic acid per year in emissions unit F006.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following for emissions unit F006:
 - a. the total quantity of muriatic acid employed, in gallons;
 - b. the results of any analyses for HCl content in the muriatic acid provided by the supplier for any shipments of muriatic acid to the facility in that month; and
 - c. the total number of hours the muriatic acid is employed.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record (analytical results) showing an exceedance of the HCl content limitation in Section B.1. of these terms and conditions. The permittee shall also notify Hamilton County Department of Environmental Services of any exceedance of the annual muriatic acid usage limitation in Section B.2. of these terms and conditions. The permittee shall notify the Hamilton County Department of Environmental Services of any such exceedance within 45 days after its occurrence.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1 of these terms and conditions shall be determined in

accordance with the following method(s):

Emissions Limitation:

Hydrochloric acid (HCl) emissions shall not exceed 6.3 pounds per hour and 3.2 tons per year.

Applicable Compliance Method:

Maximum throughput and calculations are based on the capacity of the Hydroblast Sprayer, the HCl content in the muriatic acid, an estimate of HCl emissions based on overspray, and, in the case of the tons per year HCl limit, the BAT muriatic acid limit usage limit.

HCl emission factor = 0.10 lb of HCl emitted/lb of HCl.

Muriatic acid HCl content = 31.5% or 0.315 lb of HCl/lb of muriatic acid.

Application rate = 200 lbs of muriatic acid/hr; 20,700 gallons of muriatic acid/yr.

$200 \text{ lbs of muriatic acid/hr} \times 0.315 \text{ lb of HCl/lb of muriatic acid} \times 0.10 \text{ lb of HCl emitted/lb of HCl} = 6.3 \text{ lbs of HCl/hr}$.

$20,700 \text{ gallons of muriatic acid/yr} \times 9.7 \text{ lbs of acid/gallon of acid} \times 0.315 \text{ lb of HCl/lb of muriatic acid} \times 0.10 \text{ lb of HCl emitted/lb of HCl} \times \text{ton}/2000 \text{ lbs} = 3.2 \text{ tons per year of HCl}$.

2. Emissions Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

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)(3).

F. **Miscellaneous Requirements**

1. None