

Facility ID: 1652000030 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.

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[Go to Part II for Emissions Unit P003](#)

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Facility ID: 1652000030 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>
HCl acid pickling line	OAC rule 3745-31-05 (PTI 16-1483)	See A.2.a below.

2. Additional Terms and Conditions

- (a) The stack emissions of HCl shall not exceed 0.53 pound per hour.
The permittee shall employ best available technology to capture and vent HCl emissions to a scrubber (s). The capture efficiency shall be sufficient to limit total fugitive emissions to 0.1 ton per year.

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 7488, based upon a rolling, 12-month summation of the operating hours.
2. The scrubber water supply pressure shall be continuously maintained at a value of not less than 15 pounds per square inch (gauge) and not more than 21 pounds per square inch (gauge) at all times while the emissions unit is in operation.
3. After the water flow rate monitor is installed, a minimum scrubber water flow rate value which demonstrates that the emissions unit is in compliance shall be determined. The scrubber water flow rate shall be continuously maintained at or above this value.
4. The pH of the scrubber liquor shall be maintained at or above 0.5.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. the rolling, 12-month summation of the operating hours.
2. The permittee shall properly install, operate and maintain equipment to monitor the water supply pressure and the water flow rate while the emissions unit is in operation. The monitoring devices and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The water flow rate monitor shall be installed no later than January 1, 1999.
3. The permittee shall collect and record the following information each day:
 - a. the scrubber water supply pressure, in psig, every two hours while the emissions unit is operating;
 - b. the scrubber water flow rate, in gpm, every two hours while the emissions unit is operating;
 - c. the pH of the scrubber liquor, every two hours while the emissions unit is operating; and
 - d. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels as described in Section B:
 - a. the scrubber water supply pressure;
 - b. the scrubber water flow rate; and
 - c. the pH of the scrubber liquor.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition 3.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for HCl.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for HCl Methods 1-4 and 26 of 40 CFR Part 60, Appendix A.
 - d. The test(s) 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 local air agency.
 - e. The scrubber water supply pressure, scrubber water flow rate, and the pH of the scrubber liquor shall be monitored during the stack test to reestablish or confirm the operating ranges of these scrubber parameters.
 - f. Method 7903 from the National Institute for Occupational Safety and Health Manual of Analytical Methods shall be employed to determine the concentration of HCl in the area around the steel pickling line in order to determine fugitive emissions.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).
3. 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 unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests 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 the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

0.53 lb/hr of HCl

Applicable Compliance Method:

Compliance with the allowable mass emission rate for HCl shall be determined in accordance with 40 CFR Part 60, Appendix A Methods 1-4 and 26 and through the monitoring of the scrubber operating parameters.

Emission Limitation:

0.1 TPY of fugitive HCl emissions

Applicable Compliance Method:

Compliance with the fugitive emissions of HCl shall be determined by employing Method 7903 from the National Institute for Occupational Safety and Health's Manual of Analytical Methods to determine the concentration of HCl in the area around the steel pickling line and through the calculation methods provided by HOK/K Industrial, Inc. on May 31, 1995 for Valley City Steel.

F. Miscellaneous Requirements

1. None

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Facility ID: 1652000030 Emissions Unit ID: P003 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>
HCl acid regeneration plant	OAC rule 3745-31-05 (PTI 16-1483)	See A.2.a below.

2. Additional Terms and Conditions

- (a) The stack emissions of HCl shall not exceed 0.67 pound per hour.
The permittee shall employ best available technology to capture and vent HCl emissions to a scrubber (s). The capture efficiency shall be sufficient to limit total fugitive emissions to 0.1 ton per year.

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 6048, based upon a rolling, 12-month summation of the operating hours.
2. The scrubber water supply pressure shall be continuously maintained at a value of not less than 15 pounds per square inch (gauge) and not more than 21 pounds per square inch (gauge) at all times while the emissions unit is in operation.
3. The scrubber water flow rate shall be continuously maintained at a value of not less than 1.32 gallons per minute at all times while the emissions unit is in operation.
4. The pH of the scrubber liquor shall be maintained at or above 0.5.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month; and
 - b. the rolling, 12-month summation of the operating hours.
2. The permittee shall properly install, operate and maintain equipment to monitor the water supply pressure and the water flow rate while the emissions unit is in operation. The monitoring devices and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The water flow rate monitor shall be installed no later than January 1, 1999.
3. The permittee shall collect and record the following information each day:
 - a. the scrubber water supply pressure, in psig, every two hours while the emissions unit is operating;
 - b. the scrubber water flow rate, in gpm, every two hours while the emissions unit is operating;
 - c. the pH of the scrubber liquor, every two hours while the emissions unit is operating; and
 - d. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels as described in Section B:
 - a. the scrubber water supply pressure;
 - b. the scrubber water flow rate; and
 - c. the pH of the scrubber liquor.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term

and Condition 3.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for HCl.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for HCl Methods 1-4 and 26 of 40 CFR Part 60, Appendix A.
 - d. The test(s) 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 local air agency.
 - e. The scrubber water supply pressure, scrubber water flow rate, and the pH of the scrubber liquor shall be monitored during the stack test to reestablish or confirm the operating ranges of these scrubber parameters.
 - f. Method 7903 from the National Institute for Occupational Safety and Health Manual's Manual of Analytical Methods shall be employed to determine the concentration of HCl in the area around the HCl Regeneration Plant in order to determine fugitive emissions.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).
3. 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 unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
4. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests 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 the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
5. Compliance with the emission limitations in Section A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

0.67 lb/hr of HCl

Applicable Compliance Method:

Compliance with the allowable mass emission rate for HCl shall be determined in accordance with 40 CFR Part 60, Appendix A Methods 1-4 and 26 and through the monitoring of the scrubber operating parameters.

Emission Limitation:

0.1 TPY of fugitive HCl emissions

Applicable Compliance Method:

Compliance with the fugitive emissions of HCl shall be determined by employing Method 7903 from the National Institute for Occupational Safety and Health's Manual of Analytical Methods to determine the concentration of HCl in the area around the HCl Regeneration Plant and through the calculation methods provided by HOK/K Industrial, Inc. on May 31, 1995 for Valley City Steel.

F. Miscellaneous Requirements

1. None