

Facility ID: 1677040002 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.

[Go to Part II for Emissions Unit T001](#)

[Go to Part II for Emissions Unit T002](#)

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

Facility ID: 1677040002 Emissions Unit ID: T001 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>
Fixed roof storage tank with a capacity of 200,000 gallons	OAC rule 3745-31-05 PTI 16-915 Issued 7/25/1990	0.74 pound per hour of HCl See A.2.a below.

2. **Additional Terms and Conditions**
 - (a) The fume scrubber shall achieve a minimum control efficiency of 95%.

B. Operational Restrictions

1. The emissions from this emissions unit shall be vented to a wet scrubber at all times the emissions unit is in operation.

C. Monitoring and/or Record Keeping 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 the scrubber, the liquid flow rate, and the liquid pH shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.
2. The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge), the scrubber liquid flow rate (in gallons per minute), and the scrubber liquid pH during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid's pH and flow rate on [XXXX1] basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) specified in 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, flow rate, and 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 range(s) and/or limit(s) for the pressure drop, liquid flow rate, and 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, liquid flow rate, or pH based upon information obtained during future emission tests that demonstrate compliance with the allowable HCl emission rate for this/these emissions unit(s). 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 an administrative modification.

D. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the wet scrubber during the operation of the controlled emissions unit(s):
 - a. each period of time when the pressure drop across the scrubber, the liquid flow rate, and/or the liquid pH 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. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop, liquid flow rate, and/or liquid pH into compliance with the acceptable range or limit, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:
Emission Limitation:

0.74 pound per hour of HCl

Applicable Compliance Method:

Multiply the hydrochloric acid emission factor of 0.0000673 pound of hydrochloric acid emissions per gallon* by the maximum loading rate in gallons per minute times 60 minutes per hour.

*The hydrochloric acid emission factor was derived from the permittee's permit to install application.
Emission Limitation:

The fume scrubber shall achieve a minimum control efficiency of 95%.

Applicable Compliance Method:

Stack testing may be required in the future in accordance with approved EPA procedures and test methods.

F. Miscellaneous Requirements

1. None

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Facility ID: 1677040002 Emissions Unit ID: T002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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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>
Fixed roof storage tank with a capacity of 200,000 gallons	OAC rule 3745-31-05 PTI 16-915 Issued 7/25/1990	0.74 pound per hour of HCl See A.2.a below.

2. **Additional Terms and Conditions**

- (a) The fume scrubber shall achieve a minimum control efficiency of 95%.

B. **Operational Restrictions**

1. The emissions from this emissions unit shall be vented to a wet scrubber at all times the emissions unit is in operation.

C. **Monitoring and/or Record Keeping 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 the scrubber, the liquid flow rate, and the liquid pH shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.
2. The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge), the scrubber liquid flow rate (in gallons per minute), and the scrubber liquid pH during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid's pH and flow rate on [XXXX1] basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) specified in this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- the date and time the deviation began;
- the magnitude of the deviation at that time;
- the date the investigation was conducted;
- the name(s) of the personnel who conducted the investigation; and
- 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:

- a description of the corrective action;
- the date the corrective action was completed;
- the date and time the deviation ended;
- the total period of time (in minutes) during which there was a deviation;
- the pressure drop, flow rate, and pH readings immediately after the corrective action was implemented; and
- 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 range(s) and/or limit(s) for the pressure drop, liquid flow rate, and 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, liquid flow rate, or pH based upon information obtained during future emission tests that demonstrate compliance with the allowable HCl emission rate for this/these emissions unit(s). 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 an administrative modification.

D. **Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the wet scrubber during the operation of the controlled emissions unit(s):
- each period of time when the pressure drop across the scrubber, the liquid flow rate, and/or the liquid pH 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;
 - an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop, liquid flow rate, and/or liquid pH into compliance with the acceptable range or limit, was determined to be necessary and was not taken; and
 - an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method:
Emission Limitation:

0.74 pound per hour of HCl

Applicable Compliance Method:

Multiply the hydrochloric acid emission factor of 0.0000673 pound of hydrochloric acid emissions per gallon* by the maximum loading rate in gallons per minute times 60 minutes per hour.

*The hydrochloric acid emission factor was derived from the permittee's permit to install application.

Emission Limitation:

The fume scrubber shall achieve a minimum control efficiency of 95%.

Applicable Compliance Method:

Stack testing may be required in the future in accordance with approved EPA procedures and test methods.

F. Miscellaneous Requirements

1. None