Facility ID: 1677130066 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

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Continuous steel strip pickling line	OAC rule 3745-31-05 See F.1 below.	0.47 lb/hr of hydrochloric acid

2. **Additional Terms and Conditions**

   (a) The permittee shall operate and maintain a wet scrubber for the control of hydrochloric acid in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

B. **Operational Restrictions**

1. The scrubber water supply pressure shall be continuously maintained at a value of not less than 9 inches of water at all times while the emissions unit is in operation.

2. The scrubber water flow rate shall be continuously maintained at a value of not less than 2.5 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 install, operate and maintain equipment to monitor and record 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 permittee shall collect and record the following information each day:

   a. the water supply pressure, in psig, on a once per shift basis;

   b. the water flow rate, in gpm, on a once per shift basis; and

   c. a log or record of downtime 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 that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:

   a. the water supply pressure; and

   b. the scrubber water flow rate.

2. The deviation (excursion) reports shall be submitted in accordance with the requirements in Section 3 of the General Terms and Conditions.

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 6 months prior to permit renewal.

   b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate

for hydrochloric acid.

c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 26A.

d. The test 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.

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).

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.

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.

3. 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:

0.47 lb/hr of hydrochloric acid

Applicable Compliance Method:

Method 26A, 40 CFR Part 60, Appendix A.

F. **Miscellaneous Requirements**

1. The following terms and conditions shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 16-1556, as issued on July 11, 1996: A, B, C, D and E.