



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
FRANKLIN COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08732

Fac ID: 0125040026

DATE: 1/29/2008

Clark Grave Vault
Chuck Searl
375 E Fifth Avenue
Columbus, OH 43201

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO



**Permit To Install
Terms and Conditions**

**Issue Date: 1/29/2008
Effective Date: 1/29/2008**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-08732

Application Number: 01-08732
Facility ID: 0125040026
Permit Fee: **\$200**
Name of Facility: Clark Grave Vault
Person to Contact: Chuck Searl
Address: 375 E Fifth Avenue
Columbus, OH 43201

Location of proposed air contaminant source(s) [emissions unit(s)]:

**375 E Fifth Avenue
Columbus, Ohio**

Description of proposed emissions unit(s):

Plating line.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Clark Grave Vault
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Modification Issued: 1/29/2008

Facility ID: 012504002

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
Sulfuric acid	0.99
Potassium hydroxide	0.81
Phosphoric acid	0.74

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P007 - galvanizing pretreatment line with packed bed scrubbers	OAC rule 3745-31-05(A)(3)	Sulfuric acid emissions shall not exceed 0.23 pound per hour and 0.99 ton per year. Potassium hydroxide emissions shall not exceed 0.19 pound per hour and 0.81 ton per year. Phosphoric acid emissions shall not exceed 0.17 pound per hour and 0.74 ton per year. See section B.1.

2. Additional Terms and Conditions

- 2.a The 0.23 pound per hour sulfuric acid limitation was established to reflect the potential to emit for the emissions unit as vented to a packed bed scrubber. Therefore, the parametric monitoring of the scrubbers as established in the following terms and conditions will ensure compliance with this limit.
- 2.b The 0.19 pound per hour potassium hydroxide limitation was established to reflect the potential to emit for the emissions unit as vented to a packed bed scrubber. Therefore, the parametric monitoring of the scrubbers as established in the following terms and conditions will ensure compliance with this limit.
- 2.c The 0.17 pound per hour phosphoric acid limitation was established to reflect the potential to emit for the emissions unit as vented to *the* packed bed scrubbers. Therefore, the parametric monitoring of the scrubbers as established in the following terms and conditions will ensure compliance with this limit.

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PTI Application: 01 00722
Modif

Facility ID: 012504002

Emissions Unit ID: P007

B. Operational Restrictions

1. The permittee shall operate the packed bed *scrubbers* whenever this emissions unit is in operation.
2. The pressure drop across the scrubbers shall be continuously maintained at a value of not less than *1 inch* of water at all times while the emissions *units are* in operation.
3. The scrubber water flow rate shall be continuously maintained at a value of not less than *15 gallons per minute per scrubber* at all times while the emissions unit is in operation.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the packed bed scrubbers *were* not in service when the emissions unit was in operation.
2. The permittee shall maintain records of the following information:
 - a. The name and identification number of each cleaning material employed; and
 - b. The total annual number of gallons of each cleaning material employed for this emissions unit.
3. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubbers and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
4. The permittee shall collect and record the following information each day while the emissions unit is in operation:
 - a. The pressure drop across the scrubbers, in inches of water, on daily basis; and
 - b. The scrubber water flow rate, in gallons per minute, on daily basis.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include an identification

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of each day in which the packed bed scrubbers were not in service when the emissions unit was in operation.

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:
 - a. The static pressure drop across the scrubbers; and
 - b. The scrubber water flow rate.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Sections A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
Sulfuric acid emissions shall not exceed 0.23 pound per hour and 0.99 ton per year.

Applicable Compliance Method:

Compliance with the hourly emission limit shall be demonstrated by multiplying the maximum hourly use of the acidic cleaner (1.1 gallons per hour) by the density of the cleaner (10.23 pounds per gallon), the percent by weight of sulfuric acid (20 %), and the control efficiency of the scrubbers (90%).

Compliance with the annual emissions limit shall be demonstrated by multiplying the annual usage of acidic cleaner (in gallons per year) by the density of the cleaner (10.23 pounds per gallon), the percent by weight of sulfuric acid (20 %), and the control efficiency of the scrubbers (90%).

- b. Emission Limitation:
Potassium hydroxide emissions shall not exceed 0.19 pound per hour and 0.81 ton per year.

Applicable Compliance Method:

Compliance with the hourly emission limit shall be demonstrated by multiplying the maximum hourly use of the alkaline cleaner (1.25 gallons per hour) by the density of the cleaner (9.87 pounds per gallon), the percent by weight of potassium hydroxide (15 %), and the control efficiency of the scrubbers (90%).

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Facility ID: 012504002

Emissions Unit ID: **P007**

Compliance with the annual emissions limit shall be demonstrated by multiplying the annual usage of alkaline cleaner (in gallons per year) by the density of the cleaner 9.87 pounds per gallon), the percent by weight of potassium hydroxide (15 %), and the control efficiency of the scrubbers (90%).

- c. Emission Limitation:
Phosphoric acid emissions shall not exceed 0.17 pound per hour and 0.74 ton per year.

Applicable Compliance Method:

Compliance with the hourly emission limit shall be demonstrated by multiplying the maximum hourly use of the acidic cleaner (1.1 gallons per hour) by the density of the cleaner (10.23 pounds per gallon), the percent by weight of phosphoric acid (15 %), and the control efficiency of the scrubbers (90%).

Compliance with the annual emissions limit shall be demonstrated by multiplying the annual usage of acidic cleaner (in gallons per year) by the density of the cleaner (10.23 pounds per gallon), the percent by weight of phosphoric acid (15 %), and the control efficiency of the scrubbers (90%).

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

NEW SOURCE REVIEW FORM B

PTI Number: 01-08732 Facility ID: 0125040026

FACILITY NAME Clark Grave Vault

FACILITY DESCRIPTION Galvanizing pretreatment line CITY/TWP Columbus

SIC CODE 3995 SCC CODE 40202502 EMISSIONS UNIT ID P007

EMISSIONS UNIT DESCRIPTION galvanizing pretreatment line with packed bed scrubbers

DATE INSTALLED Upon PTI issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics				0.23 lb/hr sulfuric acid; 0.19 lb/hr potassium hydroxide; 0.17 lb/hr phosphoric acid	0.99 tpy sulfuric acid; 0.81 tpy potassium hydroxide; 0.74 tpy phosphoric acid

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Emissions limitations, use of packed bed scrubbers

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: sulfuric acid, potassium hydroxide, phosphoric acid (all less than 1 tpy)