Facility ID: 0204010356 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: 0204010356 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Mixing Tank (UT-1) for blending, reaction, and production of Polyaluminum Chlorosulfate; with scrubber control system (P003).	OAC 3745-31-05 See section F	Hydrochloric acid emissions from this emissions unit shall not exceed 0.36 lb/hr.
	OAC 3745-31-05 See Section F.	See Section A.2.
	OAC 3745-17-11	Particulate emissions from this emissions unit shall not exceed 7.58 pounds per hour.

2. **Additional Terms and Conditions**

   (a) The permittee shall operate and maintain a venturi scrubber (primary control device) and packed tower (secondary control device) as an emissions control system for the hydrochloric acid emissions associated with this emissions unit and shall have a control efficiency of at least 99.0 percent and shall operate at all times during the production of aluminum chlorosulfate in this emissions unit.

B. **Operational Restrictions**

1. Venturi/Packed Bed Scrubber Operational Restrictions:
   The pressure drop across the scrubber shall be continuously maintained at a value of not less than 17.0 +/- 2.0 inches of water at all times while the emissions unit is in operation.
   The scrubber water flow rate shall be continuously maintained at a value of not less than 282.5 +/- 10.0 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 operate and maintain equipment to continuously monitor the static pressure drop across the scrubber 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. The permittee shall collect and record the following information each day:

   a. the pressure drop across the scrubber, in inches of water, on an hourly basis during each production batch operation;

   b. the scrubber water flow rate, in gallons per minute, on an hourly basis during each production batch; and

   c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

2. The permittee shall maintain records indicating, on a monthly basis, the number of aluminum chlorosulfate production batches run, the total weight of aluminum sulfate and hydrochloric acid used, and the total production time for this emissions unit during the month.

3. All scheduled (and unscheduled) maintenance of the emissions control system shall be recorded in a maintenance log kept on file at this facility.

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 static pressure drop across the scrubber; and

b. the scrubber water flow rate.

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitations: Particulate emissions not to exceed 7.58 lb/hr.

Applicable Compliance Method: If required, use of OAC Rule 3745-17-03(B)(10) in conjunction with production data required to be recorded in Section C.2. of these terms and conditions.
Emission Limitations: Hydrochloric acid emissions not to exceed 0.36 lb/hr.

Applicable Compliance Method: AP-42 Emissions Factors, Section 5.7, and compilation of recorded data on tons of hydrochloric acid received and loaded into tank per delivery. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the hydrochloric acid emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 26.
Emissions Control Limitation: The venturi scrubber/packed tower emissions control system shall have a control efficiency of at least 99.0 percent at all times during the receipt and loading of hydrochloric acid into this emissions unit.

Applicable Compliance Method: Control efficiency of the venturi scrubber control system shall be assumed to be 99.0 percent based on emissions testing conducted on April 23, 1997. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the hydrochloric acid emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 26.

F. **Miscellaneous Requirements**

1. The following terms and conditions shall supersede all the air pollution control requirements contained in permit to install No. 02-9125, as issued on June 28, 1995: A., B., C., D., and E.