



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

6/29/2010

Certified Mail

Robert Schmude
Millennium Inorganic Chemicals, Inc. Plant #1
2900 Middle Road
Ashtabula, OH 44004

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0204010200
Permit Number: P0106447
Permit Type: Administrative Modification
County: Ashtabula

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Kevin Boyce," 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NEDO; Pennsylvania; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Millennium Inorganic Chemicals, Inc. Plant #I**

Facility ID: 0204010200
Permit Number: P0106447
Permit Type: Administrative Modification
Issued: 6/29/2010
Effective: 6/29/2010



Division of Air Pollution Control
Permit-to-Install
for
Millennium Inorganic Chemicals, Inc. Plant #I

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Authorization

Facility ID: 0204010200
Facility Description: Manufacturer of titanium dioxide
Application Number(s): M0000823
Permit Number: P0106447
Permit Description: Administrative modification of PTI #02-16029 for emissions units P002 and P011 in order to resolve permit appeal.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 6/29/2010
Effective Date: 6/29/2010

This document constitutes issuance to:

Millennium Inorganic Chemicals, Inc. Plant #1
2900 Middle Road
Ashtabula, OH 44004

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0106447
Permit Description: Administrative modification of PTI #02-16029 for emissions units P002 and P011 in order to resolve permit appeal.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P002
Company Equipment ID:	Spray Dryer A
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	Oxygen Preheater and TiCl4 Vaporizer Train A
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written 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. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.

- 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 state-only required 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 Ohio EPA DAPC, Northeast District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.



- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.

C. Emissions Unit Terms and Conditions



1. P002, Spray Dryer A

Operations, Property and/or Equipment Description:

Train A Finishing process: including a TiO2 paste feed tank (TNK-2501), TiO2 paste dryer (DRY-2505), a 24 mmBtu/hr natural gas fired burner (BRN-2508) with two baghouses (BAG-2515 and BAG-2520) to control particulate emissions

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11	PE shall not exceed 19.2 lbs/hr. The allowable, hourly PE rate is based on Table 1 in OAC rule 3745-17-11.

(2) Additional Terms and Conditions

a. Emissions unit P002 is considered an existing source since it was installed in 1968. This emissions unit is not subject to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in the Train "A" TiO2 paste dryer burner (BRN-2508).

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be

noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. whether the visible emissions during the observation period were continuous or intermittent; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that include an identification of each day when a fuel other than natural gas was burned in the Train "A" TiO₂ paste dryer burner (BRN-2508). Each report shall be submitted within 30 days after the deviation occurs.
- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined based upon OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

PE shall not exceed 19.2 lbs/hr.

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation may be used:

$$E_{PE} = Q_{ds} \times (PE_{\text{grain load}}) \times (1 \text{ lb PE}/7000 \text{ grains PE}) \times (60 \text{ min/hr})$$

where:

E_{PE} = PE rate, in pounds per hour;

Q_{ds} = dry, standard actual exhaust flow from the final egress point (STK-2535), in dry standard cubic feet per minute (dcfm), measured during the most recent, representative stack test conducted at maximum capacity;

PE grain load = maximum particulate load from the final egress point (STK-2535), in grains PE/dscf, measured during the most recent, representative stack test conducted at maximum capacity;

1 lb PE/7000 grains = grains to pounds conversion factor; and

60 min/hr = minutes to hours conversion factor.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

g) Miscellaneous Requirements

- (1) Emissions unit P002 previously included process units associated with the following newly designated emissions units: (P011) Train "A" Oxidation Process; (S008 - S009) Train "A" Slurry Surge Tanks Nos. 1, 2 and 3; (Z400) Train "A" Wet Slurry Flow Treatment; (S016 - S018) Train "A" Rotary Drum Vacuum filter Separators Nos. 1, 2 and 3; (S023 - S026) Train "A" Micronizing (Grinding) Operations; and (S030 - S033) Train "A" Dry Pigment Packaging.



2. P011, Oxygen Preheater and TiCl₄ Vaporizer Train A

Operations, Property and/or Equipment Description:

Train A Oxidation process: including an aluminum chloride generator (GEN-1903), an oxidation reactor (REA-1921) with a pair filter product capture device (FLT-1935), a flue pond (HEX-1924) and a slurry tank (TNK-1940)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

14.6 mmBtu/hr natural gasfired titanium tetrachloride (TiCl₄) vaporizer (VAP-1901):

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Carbon monoxide (CO) emissions shall not exceed 1.19 lbs/hr. Nitrogen oxides (NO _x) emissions shall not exceed 1.42 lbs/hr. Organic compound (OC) emissions shall not exceed 0.16 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-10(B)(1).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack egress shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/mmBtu of actual heat input.

7 mmBtu/hr natural gas-fired oxygen (O₂) preheater (HTR-1902):

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	CO emissions shall not exceed 0.57 lb/hr.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		NOx emissions shall not exceed 0.68 lb/hr. OC emissions shall not exceed 0.08 lb/hr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-10(B)(1).
b.	OAC rule 3745-17-07(A)	Visible PE from any stack egress shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/mmBtu of actual heat input.

All egress points:

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	PE shall not exceed 1.89 tons/year. CO emissions shall not exceed 7.72 tons/year. NOx emissions shall not exceed 9.19 tons/year. OC emissions shall not exceed 1.01 tons/year.

(2) Additional Terms and Conditions

a. Exhaust gases from the paire filter (FLT-1935) product capture device, serving the oxidation reactor, are routed to the Train "A" Chlorination Process (P001) instead of the atmosphere. However, during startup, shutdown or equipment pressure testing, nitrogen or oxygen is used to warm or purge the oxygen preheater (HTR-1902), so no air contaminant emissions are generated when the paire filter gases are exhausted to the atmosphere.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in the TiCl₄ vaporizer (VAP-1901) burner and in the O₂ preheater burner (HTR-1902).

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain a record of the daily hours of operation for this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that include an identification of each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (2) The permittee shall submit annual reports that specify the CO, NO_x, OC and PE for the previous calendar year, in tons/year. These reports shall be submitted by April 15 of each year. The fee emissions report submittal, required by OAC rule 3745-77-07(A)(8) and OAC rule 3745-78, will fulfill the requirements of this permit term.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible PE from any stack egress shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined based upon OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

PE shall not exceed 0.020 lb/mmBtu of actual heat input from each egress point for the TiCl₄ vaporizer (VAP-1901) and the O₂ preheater (HTR-1902).

Applicable Compliance Method:

To determine the worst case emissions rate, the following equation may be used:

$$E(\text{PE}) = EF/\text{HC}$$

where:

E_VAP1901(PE) = the PE rate from the TiCl₄ vaporizer (VAP-1901), in pounds PE per million Btu of maximum heat input;

$E_{HTR1902(PE)}$ = the PE rate from the O₂ preheater (HTR-1902), in pounds PE per million Btu of maximum heat input;

EF = the emission factor for the PE rate, 1.9 pounds of filterable particulate emissions per million cubic feet of natural gas employed, specified in AP-42, Table 1.4-2, Chapter 1.4 (7/98); and

HC = maximum heat content of natural gas, which is 1,029 Btu per cubic foot as specified in the application for PTI 02-16029.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

1.89 TPY PE from all egress points.

Applicable Compliance Method:

To determine the annual rate, the following equation may be used:

$$PE_{TOTAL} = [(E_{VAP1901(PE)} \times mmBtu_{VAP1901/hr}) + (E_{HTR1902(PE)} \times mmBtu_{HTR1902/hr})] \times HRS/YR \times 1 \text{ ton PE}/2000 \text{ lbs PE}$$

where:

PE_{TOTAL} = the total PE rate from all egress points, in tons/year;

$mmBtu_{VAP1901/hr}$ = the maximum rated heat input capacity of the TiCl₄ vaporizer (VAP-1901), which is 14.6 mmBtu/hr as specified in the application for PTI 02-16029;

$mmBtu_{HTR1902/hr}$ = the maximum rated heat input capacity of the O₂ preheater (HTR-1902), which is 7 mmBtu/hr as specified in the application for PTI 02-16029; and

HRS/YR = the actual hours of operation per year, which is the sum of the daily operating hours, as specified in the record keeping requirements in d)(2), for the calendar year.

d. Emission Limitations:

CO emissions shall not exceed 1.19 lbs/hr from the TiCl₄ vaporizer (VA9-1901) egress.

CO emissions shall not exceed 0.57 lb/hr from the O₂ preheater (HTR-1902) egress.

NO_x emissions shall not exceed 1.42 lbs/hr from the TiCl₄ vaporizer (VA9-1901) egress.

NO_x emissions shall not exceed 0.68 lb/hr from the O₂ preheater (HTR-1902) egress.

OC emissions shall not exceed 0.16 lb/hr from the TiCl₄ vaporizer (VAP-1901) egress.

OC emissions shall not exceed 0.08 lb/hr from the O₂ preheater (HTR-1902) egress.

Applicable Compliance Method:

To determine the worst case emissions rate, the following equation may be used:

$$E(\text{lbs/hr}) = EF \times \text{mmBtu/hr} \times \text{cf}/1029 \text{ Btu}$$

where:

E(lbs/hr) = the rate of CO, NO_x or OC emissions, in pounds/hour;

EF(CO) = the CO emissions factor, 84 pounds of CO emissions per million cubic feet of natural gas employed for small, uncontrolled, natural gas-fired boilers, specified in AP-42, Table 1.4-1, Chapter 1.4 (7/98);

EF(NO_x) = the NO_x emissions factor, 100 pounds of NO_x emissions per million cubic feet of natural gas employed for small, uncontrolled, natural gas-fired boilers, specified in AP-42, Table 1.4-1, Chapter 1.4 (7/98); and

EF(OC) = the OC emissions factor, 11 pounds of OC emissions per million cubic feet of natural gas employed for small, uncontrolled, natural gas-fired boilers, specified in AP-42, Table 1.4-2, Chapter 1.4 (7/98).

e. Emission Limitations:

CO emissions shall not exceed 7.72 tons/year from all egress points.

NO_x emissions shall not exceed 9.19 tons/year from all egress points.

OC emissions shall not exceed 1.01 tons/year from all egress points.

Applicable Compliance Method:

To determine the annual rate, the following equation may be used:

$$E(\text{TPY}) = (E_{\text{VAP1901}} + E_{\text{HTR1902}}) \times \text{HRS/YR} \times 1 \text{ ton}/2,000 \text{ lbs}$$

where:

E(TPY) = the rate of CO, NO_x or OC emissions, in tons/year;

E_{VAP1901} = the CO, NO_x or OC emissions rate from the TiCl₄ vaporizer (VAP-1901), in pound(s) per hour, as specified in f)(1)d; and

E_HTR1902 = the CO, NO_x or OC emissions rate from the O₂ preheater (HTR-1902), in pound(s) per hour, as specified in f)(1)d.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with the procedures specified in the following methods:

for CO – 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10;

for NO_x - 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7E; and

for OC - 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 18, 25 or 25A, as appropriate.

Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

g) **Miscellaneous Requirements**

- (1) Newly designated emissions unit, P011, was previously associated with emissions unit, (P002) Train "A" Finishing Process.