

Facility ID: 0278080019 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 P001](#)

[Go to Part II for Emissions Unit P002](#)

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

Facility ID: 0278080019 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
hydrochloric acid steel strip pickling line, with a wet scrubber	OAC rule 3745-31-05(A)(3) (PTI 02-840) OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)	The permittee shall maintain compliance with all applicable rules in the OAC. Less than 10 lbs/hr of particulate emissions (PE), uncontrolled. See section A.2.b. Visible PE from the stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- (a) The permittee shall operate the scrubber at all times while this emissions unit is in operation. The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, based on Table I of OAC rule 3745-17-11, the PE limitation is greater than 10 pounds of PE per hour. However, to ensure that Figure II will not be applicable, the uncontrolled PE from this emissions unit shall be less than 10 pounds per hour.

B. Operational Restrictions

1. The scrubber water flow rate shall be maintained within a range of 18 to 28 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 monitor the scrubber water flow rate while the emissions unit is in operation. The monitoring device and any recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The permittee shall collect and record the scrubber water flow rate once each day that the unit is in operation.
2. If the above monitoring indicates an abnormal scrubber water flow rate, the permittee shall investigate the cause and take appropriate corrective action. Records of all corrective action shall be maintained.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the scrubber water flow rate falls below the required level specified above as well as any corrective actions taken.
2. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
Less than 10 lbs/hr of PE

Applicable Compliance Method:
Compliance with the above PE limitation shall be determined using the manufacturer supplied emission factor for the scrubber of 300 grams/hr (0.66 lb/hr, this is considered conservatively high for this source). Uncontrolled emissions are estimated to be significantly less than 10 lbs/hr. If required, compliance shall be determined

through stack testing using Method 5 of 40 CFR, Part 60, Appendix A.

Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. Stack testing for P001 on July 8, 2004 and for P002 on September 9, 2004 indicated that under maximum conditions the maximum controlled HCl emission rate is 0.413 lb/hr, combined. At 8,760 hours per year this equates to 1.81 TPY. The control equipment is to be considered when determining potential to emit as it pertains to the MACT. (Per USEPA the control equipment for both P001 and P002 is considered an integral part of the acid recovery system.) Therefore, this facility is not a major source of HAPs and is not subject to the MACT (Subpart CCC).

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Facility ID: 0278080019 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

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>
acid storage and regeneration controlled by a wet scrubber and a baghouse (The spray roaster system to remove iron oxide is controlled by a baghouse.)	OAC rule 3745-31-05(A)(3) (PTI 02-840)	The permittee shall maintain compliance with all applicable rules in the OAC.
	OAC rule 3745-17-11(B)	6.52 lbs/hr of particulate emissions (PE) from the scrubber stack and roaster stack combined, based on a maximum process weight rate of 2 tons/hr
	OAC rule 3745-17-07(A)	Visible PE from either stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

2. **Additional Terms and Conditions**
 - (a) The permittee shall operate the wet scrubber and baghouse systems at all times while the emissions unit is in operation.

B. Operational Restrictions

1. The scrubber water flow rate shall be maintained at a value of not less than 1 gallon per minute at all times while the emissions unit is in operation.
2. The pressure drop across the baghouse shall be maintained within a range of 5 to 10 inches of water column at all times that the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the scrubber water flow rate while the emissions unit is in operation. The monitoring device and any recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The permittee shall collect and record the scrubber water flow rate once each day that the unit is in operation.
2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained

in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse once each day that the unit is in operation.

3. If the above monitoring indicates an abnormal scrubber water flow rate or baghouse pressure drop, the permittee shall investigate the cause and take appropriate corrective action. Records of all corrective action shall be maintained.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the scrubber water flow rate fell below the required level specified above as well as any corrective actions taken.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above as well as any corrective actions taken.
3. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:
6.52 lbs/hr of PE

Applicable Compliance Method:

Results from stack testing performed on September 9, 2004 indicate that the particulate emission rate under worst case conditions is 1.35 lbs/hr. No additional stack testing is required at this time but could be requested by the Northeast District Office of Ohio EPA if it is believed that emissions have increased.

Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

1. Stack testing for P001 on July 8, 2004 and for P002 on September 9, 2004 indicated that under maximum conditions the maximum controlled HCl emission rate is 0.413 lb/hr, combined. At 8,760 hours per year this equates to 1.81 TPY. The control equipment is to be considered when determining potential to emit as it pertains to the MACT. (Per USEPA the control equipment for both P001 and P002 is considered an integral part of the acid recovery system.) Therefore, this facility is not a major source of HAPs and is not subject to the MACT (Subpart CCC).