

Facility ID: 0285010331 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: 0285010331 Emissions Unit ID: P003 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>
Pickle Line equipped with a packed bed scrubber	OAC rule 3745-31-05 (A)(3) (PTI No. 02-5931)	0.072 lb SO2 per hour and 0.315 ton SO2 per year (See A.1.2.a.)
	OAC rule 3745-17-11 (B)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11 (B). The requirements established pursuant to OAC rule 3745-17-11 (B) are less restrictive than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-17-07 (A)	Visible emissions from the stack following the wet scrubber shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

- (a) The mass emissions limitation for this emissions unit is based upon the unit's potential to emit. Therefore, no monitoring, record keeping, or reporting is required to demonstrate compliance.

**B. Operational Restrictions**

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 12 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 3 gallons makeup 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 makeup water flow rate while the emissions unit is in operation. The monitoring devices shall be 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 week.

- a. The pressure drop across the scrubber, in inches of water.
- b. The scrubber makeup water flow rate, in gallons per minute.
- c. The operating times 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 static pressure drop across the scrubber.
  - b. The scrubber water flow rate.

2. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. in Part I of this permit.

**E. Testing Requirements**

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

Emission Limitations:  
0.072 lb SO<sub>2</sub> per hour

Applicable Compliance Method:  
Compliance shall be determined based upon the following equation.

$$E = (30 \text{ lbs/hour}) (12\%) (2\%)$$

Where

E = SO<sub>2</sub> emissions, stated in pound per hour

30 lbs/hour = the maximum amount of SO<sub>2</sub> employed in this unit

12% = strength of the acid

2% = 100% - 98%, where 98% is the equipment manufacturer's design guaranteed control efficiency

Emission Limitations:  
0.315 tons SO<sub>2</sub> per year

Applicable Compliance Method:  
Compliance shall be determined based upon the following equation.

$$E = (0.072 \text{ lb/hour}) (8760 \text{ hours/year}) (1 \text{ ton}/2000 \text{ lbs}).$$

Emission Limitations:  
Visible emissions from the stack following the wet scrubber shall not exceed 20% opacity as a 6-minute average

Applicable Compliance Method:  
US EPA Reference Method 9, if requested.

**F. Miscellaneous Requirements**

1. None