

Facility ID: 0285030318 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.

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

Facility ID: 0285030318 Emissions Unit ID: P001 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
New Pickle Line- Molten Salt Bath 900 (degrees F) and Acid Tanks (Sulfuric, Nitric, and Hydrofluoric) vented to scrubber	OAC rule 3745-31-05(A)(3) OAC rule 3745-17-11(B) OAC rule 3745-17-07(A)	0.02 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases. 2.3 pounds of PE per hour and 9.9 tons of PE per year. (Based upon initial emissions testing, conducted on August 15, 1991, the exhaust air flow was determined to be 13,178 dscfm.) The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). The PE limitation established in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3). 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) None

B. Operational Restrictions

1. The pH of the scrubber liquor shall be maintained between 7.0 and 11.0 at all times while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly maintain equipment to continuously monitor the pH of the scrubber liquor while the emissions unit is in operation. The pH monitor 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 day:

- a. the pH of the scrubber liquor; and
- b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above. These reports shall be submitted on an annual basis to the Northeast District Office of the Ohio Environmental Protection Agency by February 1 of each year. If no deviations were recorded, a statement to that effect shall be submitted.

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 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:

Compliance shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

Emission Limitation:

0.02 grain of PE per dscf of exhaust gases
2.3 pounds of PE per hour and 9.9 tons of PE per year

Applicable Compliance Method:

Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(10). No stack testing is specifically required by this permit; however at the discretion of the Northeast District Office of the Ohio Environmental Protection Agency, stack testing may be required if in the future visible emissions increase.

F. Miscellaneous Requirements

- 1. None

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Facility ID: 0285030318 Emissions Unit ID: P002 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Old Pickle Line- Molten Salt Bath 400 (degrees F) and Acid Tanks (Sulfuric, Nitric, and Hydrofluoric) vented to scrubber	OAC rule 3745-31-05(A)(3) (PTI # 02-5574)	0.04 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases. 2.7 pounds of PE per hour and 12.0 tons of PE per year. (Based upon the design air flow rate documented in the permit application of 8,000 dscfm)
	OAC rule 3745-17-11(B)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). The PE limitation established in this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	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) None

B. Operational Restrictions

- 1. The pH of the scrubber liquor shall be maintained between 6.0 and 11.0 at all times while the emissions unit is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly maintain equipment to continuously monitor the pH of the scrubber liquor while the emissions unit is in operation. The pH monitor 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 day:

a. the pH of the scrubber liquor; and

b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above. These reports shall be submitted on an annual basis to the Northeast District Office of the Ohio Environmental Protection Agency by February 1 of each year. If no deviations were recorded, a statement to that effect shall be submitted.

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 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:

Compliance shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

Emission Limitation:

0.04 grain of PE per dscf of exhaust gases

2.7 pounds of PE per hour and 12.0 tons of PE per year

Applicable Compliance Method:

Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(10). No stack testing is specifically required by this permit; however at the discretion of the Northeast District Office of the Ohio Environmental Protection Agency, stack testing may be required if in the future visible emissions increase.

F. Miscellaneous Requirements

1. None