



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
ALLEN COUNTY
Application No: 03-05319
Fac ID: 0302020015**

CERTIFIED MAIL

DATE: 10/6/2005

PCS Nitrogen Ohio LLC
Charles Treloar
1900 Fort Amanda Rd
Lima, OH 458020628

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO

Lima-Allen Regional Planning Commission

IN

ALLEN COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-05319 FOR AN AIR CONTAMINANT SOURCE FOR
PCS Nitrogen Ohio LLC**

On 10/6/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **PCS Nitrogen Ohio LLC**, located at **1900 Fort Amanda Rd, Lima, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-05319:

Administrative modification of PTI 03-05319 issued on 7/17/91 to address nitric acid plant startup and shutdown emissions.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 03-05319

Application Number: 03-05319
Facility ID: 0302020015
Permit Fee: **To be entered upon final issuance**
Name of Facility: PCS Nitrogen Ohio LLC
Person to Contact: Charles Treloar
Address: 1900 Fort Amanda Rd
Lima, OH 458020628

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1900 Fort Amanda Rd
Lima, Ohio**

Description of proposed emissions unit(s):
Administrative modification of PTI 03-05319 issued on 7/17/91 to address nitric acid plant startup and shutdown emissions.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

PCS Nitrogen Ohio LLC

Facility ID: 0302020015

PTI Application: 03-05319

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written

PCS Nitrogen Ohio LLC
PTI Application: 03-05319

Facility ID: 0302020015

Issued: To be entered upon final issuance

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 B.8 below if no deviations occurred during the quarter.

- iii. 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 appropriate Ohio EPA District Office or local air agency 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.
 - iv. If this permit is for an emissions unit located at a Title V facility, then 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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.

PCS Nitrogen Ohio LLC

Facility ID: 0302020015

PTI Application: 03-05319

Issued: To be entered upon final issuance

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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.
- b. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

Issued: To be entered upon final issuance

- iv. 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.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit-To-Operate Application

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

PCS Nitrogen Ohio LLC
PTI Application: 03-05319

Facility ID: 0302020015

Issued: To be entered upon final issuance

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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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.

2. 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 appropriate Ohio EPA District Office or local air agency.
- 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 appropriate Ohio EPA District Office or local air agency. 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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

PCS Nitrogen Ohio LLC

Facility ID: 0302020015

PTI Application: 03-05319

Issued: To be entered upon final issuance

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing 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 modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

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.

6. 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.

7. 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).

8. Construction Compliance Certification

PCS Nitrogen Ohio LLC

Facility ID: 0302020015

PTI Application: 03-05319

Issued: To be entered upon final issuance

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

PCS Nitrogen Ohio LLC**Facility ID: 0302020015****PTI Application: 03-05319****Issued: To be entered upon final issuance****C. Permit-To-Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	122.6

PCS Nitrogen Ohio LLC

PTI Application: 03-05319

Issued: To be entered upon final issuance

Facility ID: 0302020015

PCS I

PTI A

Emissions Unit ID: P570

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

PCS I

PTI A

Emissions Unit ID: P570

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P570 - 400 tons/day Nitric Acid Plant #2 (Administrative modification to PTI #03-5319 issued on July 17, 1991 to include startup and shutdown emissions)	OAC rule 3745-31-05(A)(3)	23.2 lbs of Nitrogen Oxides (NOx)/hr, 101.6 TPY NOx (excluding startup and shutdown periods)
		From startup and shutdown periods: 21.0 tons NOx per rolling 12-month period
		1.4 lbs NOx/ton of acid produced (excluding startup and shutdown periods)
	OAC rule 3745-23-06(D)	See A.I.2.b
	40 CFR Part 60, Subpart G	See A.I.2.c
		See A.I.2.a

2. Additional Terms and Conditions

- 2.a The permittee shall not discharge into the atmosphere from this emissions unit, except during startup and shutdown periods, any gases which:
 - i. contain nitrogen oxides, expressed as NO₂, in excess of 1.5 kg per metric

PCS I**PTI A**

Emissions Unit ID: P570

Issued: To be entered upon final issuance

ton of acid produced (3.0 lbs. per ton), the production being expressed as 100% nitric acid; and

ii. exhibit 10% opacity, or greater.

2.b The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart G.

2.c The NO_x emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) and 40 CFR Part 60, Subpart G.

II. Operational Restrictions

1. The permittee shall be limited to a maximum of 28 startups and 28 shutdowns for this emissions unit per rolling 12 month period.

III. Monitoring and/or Recordkeeping

1. The permittee shall operate and maintain a continuous monitoring system for measuring nitrogen oxides (NO_x). The pollutant gas mixtures under Performance Specification 2 and for calibration checks under 40 CFR 60.13 (d) of this part shall be nitrogen dioxide (NO₂). The span value shall be 500 ppm of NO₂. Method 7 shall be used for the performance evaluations under 40 CFR 60.13 (c). Acceptable alternative methods to Method 7 are given in 40 CFR 60.74 (c). [40 CFR 60.73 (a)].
2. The permittee shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (kg/metric ton, lb/ton). The conversion factor shall be established by measuring emissions with the continuous monitoring system concurrent with measuring emissions with the applicable reference method tests. Using only that portion of the continuous monitoring emission data that represents emission measurements concurrent with the reference test data averages by the monitoring data averages to obtain a ratio expressed in units of the applicable standard to units of the monitoring data, i.e., kg/metric ton per ppm (lb/ton per ppm). The conversion factor shall be reestablished during any performance test under 40 CFR 60.8 or any continuous monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)].
3. The permittee shall record the daily production rate, and the hours of operation [40 CFR 60.73 (c)].
4. The permittee shall record the following information on a monthly basis:

PCS Nitrogen Ohio LLC
PTI A
Issue

Facility ID: 0302020015

Emissions Unit ID: P570

- a. the number of startups* and shutdowns;*
- b. the NOx emissions**, in tons;
- c. the number of startups and shutdowns per rolling, 12-month period; and
- d. the NOx emissions, in tons; per rolling 12-month period.

* A startup consists of all periods of time when the reactor gauze temperature is below a minimum operating temperature of 1700 degrees Fahrenheit, while bringing the unit online. A shutdown consists of all periods of time when the reactor gauze temperature is below a minimum operating temperature of 1200 degrees Fahrenheit, while bringing the unit offline.

Issued: To be entered upon final issuance

**The permittee may use the emission factor of 1500 lbs per event or emissions monitoring data for determining NOx emissions.

5. 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. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. For the purpose of reports required under 40 CFR 60.7 (c), periods of excess emissions that shall be reported are defined as any 3-hour period during which the average nitrogen oxides emissions (arithmetic average of three contiguous 1-hour periods) as measured by a continuous monitoring system exceed the standard under 40 CFR 60.72 (a). [40 CFR 60.73 (e)].
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 eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling 12-month limitation on startup and shutdown events. These

PCS I

PTI A

Emissions Unit ID: P570

Issued: To be entered upon final issuance

reports shall be submitted in accordance with the General Terms and Conditions of this permit.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:
 - a. The frequency of the emission testing shall be in accordance with the requirements specified in the current Title V Permit for this facility, issued on March 15th, 2004.
 - b. The emission testing shall be conducted to demonstrate compliance with the NO_x emissions limits.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: for NO_x Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
 - e. The permittee shall determine compliance with NO_x standard in 40 CFR 60.72 (a) as follows:
 - i. The emission rate (E) of NO_x shall be computed for each run using the following equation: $E = (Cs * Qsd) / (P * K)$

where:

E= emission rate of NO_x as NO₂, kg/metric ton/lb/ton of 100% nitric acid

Cs= concentration of NO_x as NO₂, g/dscm (lb/dscf)

Qsd=volumetric flow rate of effluent gas, dscm/hr (dscf/hr)

P= acid production rate, metric ton/hr (ton/hr) or 100% nitric acid

K= conversion factor, 1000g/kg (1.) lb/lb).

- ii. Method 7 shall be used to determine the NO_x concentration of each grab sample. Method 1 shall be used to select sampling site, and the sampling point shall be the centroid of the stack or duct or at a point no closer to the walls than 1 m (3.28 ft.). Four grab samples shall be taken at approximately 15-minute intervals. The arithmetic mean of the four sample concentrations shall constitute the run value (Cs).
 - iii. Method 2 shall be used to determine the volumetric flow rate (Qsd of the effluent gas. The measurement site shall be the same as for the NO_x samples are taken.
 - iv. The methods of 40 CFR 60.73 (c) shall be used to determine the production rate (P) of 100% nitric acid for each run. Material balance over the production system shall be used to confirm the production rate.
- f. The permittee may use the following as alternatives to the reference methods and procedures specified in this section:
- i. For Method 7, Method 7A, 7B, 7C, 7D, or 7E may be used. If Method 7C is used, the sampling time shall be at least 1 hour.
 - ii. The permittee shall use the procedures in 40 CFR 60.73 (b) to determine the conversion factor for converting the monitoring data to the units of the standard.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s) and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emission test (s).

Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emission from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following the completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

PCS I

PTI A

Emissions Unit ID: P570

Issued: To be entered upon final issuance

2. Compliance with the emission limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: The permittee shall not discharge into the atmosphere from this emissions unit any gases which contain nitrogen oxides, expressed as NO₂, in excess of 1.5 kg per metric ton of acid produced (3.0 lb per ton), the production being expressed as 100% nitric acid.

Applicable Compliance Method: Compliance with the NO_x emission limitation shall be based on the results of emission testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

- b. Emission Limitation: The permittee shall not discharge into the atmosphere from this emissions unit any gases which exhibit 10% opacity, or greater.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with this emission limitation pursuant to Method 9 of 40 CFR, Part 60, Appendix A.

- c. Emission Limitations: 23.3 lbs. NO_x/hr, 101.6 TPY NO_x

Applicable Compliance Method: Compliance with the NO_x emission limitation shall be based on the results of emission testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance shall be shown with the annual limitation.

- d. Emission Limitation: 1.4 lbs. NO_x/ton of acid produced

Applicable Compliance Method: Compliance with the NO_x emission limitation shall be based on the results of emission testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

- e. Emission Limitations: 21.0 tons NO_x per rolling 12-month period from startup and shutdown periods

Applicable Compliance Method: Compliance with the NO_x emission limitation shall be based on the record keeping specified in condition A.III.4.

PCS Nitrogen Ohio LLC
PTI A
Issue

Facility ID: 0302020015

Emissions Unit ID: P570

3. The permittee shall conduct, or have conducted, an annual performance evaluation of this emissions unit. Such an evaluation shall include, but not be limited to the following information:
 - a. actual production records;
 - b. control equipment efficiency and reliability including all down time;
 - c. actual emissions based on continuous emission, monitoring data and
 - d. methods investigated and/or implemented to improve control efficiency and/or reduce emissions.

This report shall be submitted by February 1 of each year and shall cover data obtained during the previous operating year.

VI. Miscellaneous Requirements

1. The allowable limit of nitrogen oxides for this emissions unit is 1.4 lbs. NO_x/ton of acid produced. The permittee may request Ohio EPA to modify this limit if the permittee demonstrates that compliance with the limit of 1.4 lbs NO_x/ton of acid produced is technically infeasible.

PCS I

PTI A

Emissions Unit ID: P570

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P570 - No 2 Nitric Acid Plant		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None