Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

9/20/2012

Certified Mail

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

Timothy Haniford
Chemtrade Logistics Inc
7680 Ottawa Rd.
P.O. Box 310
Cairo, OH 45820-0310

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0302000001
Permit Number: P0111031
Permit Type: Administrative Modification
County: Allen

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 Josh Mandel," 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, Northwest 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

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

Cc: U.S. EPA
Ohio EPA-NWDO; Indiana

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Chemtrade Logistics Inc

Facility ID:	0302000001
Permit Number:	P0111031
Permit Type:	Administrative Modification
Issued:	9/20/2012
Effective:	9/20/2012

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Chemtrade Logistics Inc

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Authorization

Facility ID:	0302000001
Facility Description:	Sulfuric Acid Production
Application Number(s):	M0001916
Permit Number:	P0111031
Permit Description:	Administrative modification to correct sulfuric acid mist testing language.
Permit Type:	Administrative Modification
Permit Fee:	$0.00
Issue Date:	9/20/2012
Effective Date:	9/20/2012

This document constitutes issuance to:

Chemtrade Logistics Inc
7680 Ottawa Rd.
P.O. Box 310
Cairo, OH 45820-0310

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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0111031
Permit Description: Administrative modification to correct sulfuric acid mist testing language.

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

Emissions Unit ID:	**P001**
Company Equipment ID:	Acid-Plant
Superseded Permit Number:	P0107677
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, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions,

andcontroldeviceoperatingparameterlimitations, 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, Northwest 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, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest 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, Northwest 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, Northwest 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, Northwest 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, Northwest District Office. If no deviations occurred during a calendar quarter, the permitteeshall

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 enteredupon 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. P001, Acid-Plant

Operations, Property and/or Equipment Description:

250 tons per day contact sulfuric acid plant, with demister

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 operation(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 are identified below. 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 3745-31-05(D)	750lbs sulfur dioxide (SO_2)/day 86.7 tons SO_2/yr
b.	OAC rule 3745-31-05(A)(3)	1.56lbs sulfuric acid (H_2SO_4) mist/hour 6.84 tons H_2SO_4/yr 3.0lbsSO_2 per ton of 100% sulfuric acid produced, 3-hour rolling average, (Short-Term Limit does not include Startup, Shutdown, or Malfunction periods.) 1.9 lbsSO_2 per ton of 100% sulfuric acid produced, 365-day rolling average, (Long-Term Limit includes Startup, Shutdown, and Malfunction periods.) The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
c.	OAC rule 3745-18-08(H)	See b)(2)b.

(2) Additional Terms and Conditions

f. This emissions unit has not yet achieved the maximum permitted capacity of 250 tons/day sulfuric acid [see section f)(2) for specific testing requirements concerning the increase in the daily production rates].

g. The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

h. Each continuous SO_2 monitoring system shall be certified to meet the requirements of 40 CFR, Part 60, Appendix B, and Performance Specification 2. At least 45 days before commencing certification testing of the continuous SO_2 monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of SO_2 emissions from the continuous monitor(s), in units of the applicable standard(s). The plan shall follow the requirements of 40, CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous SO_2 monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR, Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR, Part 60.

i. The continuous SO_2emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

j. Each continuous O_2 monitoring system shall be certified to meet the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 3. At least 45 days before commencing certification testing of the continuous O_2 monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of O_2 emissions from the continuous monitor(s), in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR, Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous O_2 monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR, Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR, Part 60.

k. The continuous O_2emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

l. Previously issued PTI No. P0107677 (a Chapter 31 modification of PTI No. P0086597) involved revisions to include a packed bed scrubber system and sulfur dioxide and O_2 continuous emission monitors (CEMs) as required in the Federal Consent Decree Case 3:09-cv-00067-JGC filed on 04/02/2009.

c) Operational Restrictions

(1) The emissions from this emissions unit shall be vented to the packed bed scrubber at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range or limit for the pressure drop across the scrubber, the liquid flow rate, and the liquid pH shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge), the scrubber liquid flow rate (in gallons per minute), and the scrubber liquid pH during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquids pH and flow rate on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable liquid flow rate and the liquid pH shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

f. the date and time the deviation began;

g. the magnitude of the deviation at that time;

h. the date the investigation was conducted;

i. the name(s) of the personnel who conducted the investigation; and

j. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date the corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop, flow rate, and pH readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

These range(s) and/or limit(s) for the pressure drop, liquid flow rate, and pH are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA,Northwest District Office. The permittee may request revisions to the permitted range or limit for the pressure drop, liquid flow rate, or pH based upon information obtained during future performance tests that demonstrate compliance with the allowable SO_2emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(3) Prior to the installation of the continuous SO_2 monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR, Part 60, Appendix B, Performance Specification 2. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous SO_2 monitoring system meets the requirements of Performance Specification 2. Once received, the letter/document of certification shall be maintained on-site and shall be made available to the Director (Ohio EPA,Northwest District Office) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

(4) The permittee shall install, operate, and maintain equipment to continuously monitor and record SO_2 emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR, Part 60.

The permittee shall maintain records of data obtained by the continuous SO_2 monitoring system including, but not limited to:

a. emissions of SO_2 in parts per million every five minutes (pursuant to the Federal Consent Decree Civil Action #3:09-cv-00067-JGC, filed 4/2/2009)

b. emissions of SO_2 in all units of the applicable standard(s) in the appropriate averaging period;

c. results of quarterly cylinder gas audits;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous SO_2 monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous SO_2 monitoring system;

h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous SO_2 monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in d)(4)g. and d)(4)h.

(5) Prior to the installation of the continuous O_2 monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR, Part 60, Appendix B, Performance Specification 3. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous O_2 monitoring system meets the requirements of Performance Specification 3. Once received, the letter/document of certification shall be maintained on-site and shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

(6) The permittee shall operate and maintain equipment to continuously monitor and record O_2 emitted from this emissions unit in percent O_2. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR, Part 60.

The permittee shall maintain records of data obtained by the continuous O_2 monitoring system including, but not limited to:

a. percent O_2 on a 5-minute basis;(pursuant to the Federal Consent Decree Civil Action #3:09-cv-00076-JGC, filed 4/2/09)

b. results of quarterly cylinder gas audits;

c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

d. results of required relative accuracy test audit(s);

e. hours of operation of the emissions unit, continuous O_2 monitoring system;

f. the date, time, and hours of operation of the emissions unit without the continuous O_2 monitoring system;

g. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous O_2 monitoring system; as well as,

h. the reason (if known) and the corrective actions taken (if any) for each such event in d)(6)f. and d)(6)g.

(7) In addition to any requirements in the Consent Decree, the Facility shall maintain records of the date, time, and duration that any of the three analyzers required under this CEMS plan is not operating In each semi-annual report required under Section IX of the Decree and in each excedd emission report required by the NSPS, the Facility specifically shall identify all periods of analyzer downtime during the reporting period and all data during the reporting period that is “substitute” data. “Substitute” data means data that is not generated contemporaneously by an analyzer at the same time as the gas flow stack (or duct) emissions are being measured, but rather, is substituted for contemporaneous analyzer measurements consistent with the provisions of the “Emissions Monitoring” section of this CEMS Plan when an analyzer is not operating.

(8) The Facility will retain all data generated by its SO_2 analyzer, coriolis meter and stack flow analyzer, including all data generated during Startup, Shutdown, and/or Malfunction (“SSM”) of the Sulfuric Acid Plant in accordance with the requirements of Section XIII of the Consent Decree.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation reports that identify the following:

a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, the liquid flow rate, or the liquid pH was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range for each parameter following any required compliance demonstration;

b. any period of time (start time and date, and end time and date)when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;

c. each incident of deviation described in e)(2)a. or e)(2)b. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)a. or e)(2)b. where prompt corrective action, that would bring the pressure drop, liquid flow rate,or scrubber liquid pH into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in e)(2)a.or e)(2)b.where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

(2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous SO_2 monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR, Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office, documenting all instances of SO_2 emissions in excess of any applicable limit specified in this permit, 40 CFR, Part 60, OAC Chapter 3745-18, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous SO_2 and other associated monitors;

iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total SO_2 emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous SO_2 monitoring system while the emissions unit was in operation;

viii. results and dates of quarterly cylinder gas audits;

ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous SO_2 monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction** of the continuous SO_2 monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime** of the continuous SO_2 monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in e)(2)b.xi. ande)(2)b.xii.

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

(3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous O_2 monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR, Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA,Northwest District Office, documenting all instances of continuous O_2 monitoring system downtime and malfunction while the emissions unit was on line.

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous O_2 and other associated monitors;

iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the total operating time (hours) of the emissions unit;

v. the total operating time of the continuous O_2 monitoring system while the emissions unit was in operation;

vi. results and dates of quarterly cylinder gas audits;

vii. unless previously submitted, results and dates of the relative accuracy test audit(s) (during appropriate quarter(s));

viii. unless previously submitted, the results of any relative accuracy test audit showing the continuous O_2 monitor out-of-control and the compliant results following any corrective actions;

ix. the date, time, and duration of any/each malfunction* of the continuous O_2 monitoring system while the emissions unit was in operation;

x. the date, time, and duration of any downtime* of the continuous O_2 monitoring system while the emissions unit was in operation; and

xi. the reason (if known) and the corrective actions taken (if any) for each event in e)(3)b.ix.ande)(3)b.x.

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

f) Testing Requirements

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

a. Emission Limitations:750lbsSO_2/day, 86.7 tons SO_2/yr

Applicable Compliance Method:

Compliance with the daily and annual emission limitations shall be based upon the CEMs monitoring and recordkeeping requirements specified in sections d)(3) through d)(6) and equations listed in Appendix F of the Federal Consent Decree #3:09-cv-00067-JGC, filed on 4/2/09.

b. Emission Limitations:1.56H_2SO_4 mist/hr, 6.84 tonsH_2SO_4 mist/yr

Applicable Compliance Method:

Compliance with the hourly H_2SO_4 emission limitation shall be based upon the results of emission testing conducted in accordance with Methods 1-4 and 8 of 40 CFR, Part 60, Appendix A.

Compliance with the annual H_2SO_4 emission limitation shall be assumed as long as compliance with the hourly allowable H_2SO_4 emission limitation is maintained (the annual limitation was established by multiplying the hourly limitation by 8,760; and then dividing by 2,000).

c. Emission Limitation: 3.0lbsSO_2/ton of 100% acid produced,3-hour rolling average, short-term limit

Applicable Compliance Method:

Compliance with the above emission limitation shall be based upon the CEMs monitoring and record keeping requirements specified in sections d)(3) through d)(6) and equations listed in Appendix F of the Federal Consent Decree #3:09-cv-00067-JGC, filed on 4/2/09.

d. Emission Limitation: 1.9 lbsSO_2 per ton of 100% sulfuric acid produced, 365-day rolling average, long-term limit

Applicable Compliance Method:

Compliance with the above emission limitation shall be based upon the CEMs monitoring and record keeping requirements specified in sections d)(3) through d)(6) and equations listed in Appendix F of the Federal Consent Decree #3:09-cv-00067-JGC, filed on 4/2/09.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted once every 18 months after issuance of this permit. If the permittee increases production above 10% of the most recent tested daily production rate which showed compliance, an additional compliance test shall be conducted within 90 days of the production increase.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for sulfuric acid mist.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

Sulfuric Acid Mist: Methods 1-4 and 8 of 40 CFR, Part 60, Appendix A

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.

(3) 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 (NWDO). 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, NWDO’s 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 emissions 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 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.

(4) Within 60 days of the effective date of this permit, the permittee shall conduct certification tests of the continuous SO_2 monitoring system in units of the applicable standard(s) to demonstrate compliance with 40 CFR, Part 60, Appendix B, Performance Specifications 2; and ORC section 3704.03(I).

Personnel from the Ohio EPA Central Office and the Ohio EPA, Northwest District Office shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the Ohio EPA, Northwest District Office and one copy to Ohio EPA Central Office and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous SO_2 monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR, Part 60, Appendix B, Performance Specifications 2; and ORC section 3704.03(I).

Ongoing compliance with the SO_2 emission limitations contained in this permit, 40 CFR, Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR, Part 60.

(5) Within 60 days of the effective date of this permit, the permittee shall conduct certification tests of the continuous O_2 monitoring system to demonstrate compliance with 40 CFR, Part 60, Appendix B, Performance Specification 3 and ORC section 3704.03(I).

Personnel from the Ohio EPA Central Office and the Ohio EPA, Northwest District Office shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the Ohio EPA, Northwest District Office and one copy to Ohio EPA Central Office and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous O_2 monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 3 and ORC section 3704.03(I).

Ongoing compliance with the O_2 monitoring requirements contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and demonstration of compliance with the quality assurance/quality control plan, which shall meet all of the testing and recertification requirements of 40 CFR, Part 60.

g) Miscellaneous Requirements

(1) None.