



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

10/10/2012

Brad Knaack  
ITW Bedford Wire  
26101 Fargo Ave  
Bedford Hts, OH 44146

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318046102  
Permit Number: P0110591  
Permit Type: Renewal  
County: Cuyahoga

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://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

If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: CDAQ





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
ITW Bedford Wire**

Facility ID:	1318046102
Permit Number:	P0110591
Permit Type:	Renewal
Issued:	10/10/2012
Effective:	10/10/2012
Expiration:	10/10/2022





Division of Air Pollution Control
Permit-to-Install and Operate
for
ITW Bedford Wire

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## Authorization

Facility ID: 1318046102  
Application Number(s): A0045268  
Permit Number: P0110591  
Permit Description: PTIO renewal permit for a sulfuric acid steel pickling line (P001) consisting of three 5,000-gallon pickling tanks and controlled by a packed bed scrubber, and an HCl pickling line (P002) consisting of two pickling tanks and one circulation tank containing an aggregate of 8,500-gallons and controlled by a packed bed scrubber.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 10/10/2012  
Effective Date: 10/10/2012  
Expiration Date: 10/10/2022  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

ITW Bedford Wire  
26101 FARGO AVE  
Bedford Heights, OH 44146

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

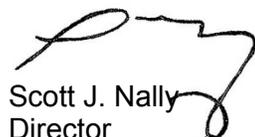
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality  
2nd Floor  
75 Erieview Plaza  
Cleveland, OH 44114  
(216)664-2297

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0110591  
Permit Description: PTIO renewal permit for a sulfuric acid steel pickling line (P001) consisting of three 5,000-gallon pickling tanks and controlled by a packed bed scrubber, and an HCl picking line (P002) consisting of two pickling tanks and one circulation tank containing an aggregate of 8,500-gallons and controlled by a packed bed scrubber.

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

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Sulfuric Acid Pickling Tanks
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	HCl picking line.
Superseded Permit Number:	P0095130
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a



renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Cleveland Division of Air Quality in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile 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).

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

## **B. Facility-Wide Terms and Conditions**

1. 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).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

## **C. Emissions Unit Terms and Conditions**



1. P001, Sulfuric Acid Pickling Tanks

Operations, Property and/or Equipment Description:

A sulfuric acid steel pickling line consisting of three pickling tanks containing 5,000-gallons of sulfuric acid at 140 degrees Fahrenheit. The sulfuric acid pickling tanks are controlled by a packed bed fume scrubber with water sprays.

a) 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.

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(A)(3)	Sulfuric acid (H <sub>2</sub> SO <sub>4</sub> ) as particulate emissions (PE) shall not exceed 2.26 lbs/hour or 9.9 tons/year from the stack serving this emissions unit.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)(1)	The particulate emission limitation established by this rule is less stringent than the particulate limitation established pursuant to OAC rule 3745-31-05(A)(3).

- (2) Additional Terms and Conditions
  - a. The emissions from this emissions unit shall be vented to the packed bed scrubber control device at all times the emissions unit is in operation.
- c) Operational Restrictions
  - (1) The static pressure drop across the scrubber shall be continuously maintained at a value not less than one and no more than 2 inches of water across the packing.
  - (2) The scrubber water flow rate shall be continuously maintained at a value no less than the one stated by the manufacturer's operation manual, while this unit is in operation.
  - (3) The scrubber water supply pressure shall be continuously maintained at a value of no less than the one stated by the manufacturer's operation manual, while this emissions unit is in operation.
  - (4) The permittee shall follow the manufacturer's recommended maintenance, at the recommended intervals, on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to the exhaust system, scrubber fans, and motors associated with those pumps and fans.
  - (5) The scrubber internals and mist eliminators shall be cleaned at intervals sufficient to prevent buildup of solids or other fouling.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each day:
    - a. the pressure drop across the scrubber in inches of water, on a twice-per-shift basis;
    - b. the scrubber water flow rate, in gallons per minute, on a twice-per-shift basis;
    - c. the scrubber water supply pressure on a twice-per-shift basis;
    - d. the operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
  - (2) The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the scrubber, the scrubber water flow rate (in gallons per minute), and the scrubber water supply pressure for the scrubber employed for this emissions unit, while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

Whenever the monitored value for any parameter deviated 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:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of the 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 determined that a 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:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time during which there was a deviation;
- j. the pressure drop, flow rate, and scrubber water supply pressure, immediately after the corrective action(s) was/were implemented; and
- k. the name(s) of personnel who performed the work.

Investigations 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.

The range(s) and/or limit(s) for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Cleveland Division of Air Quality (Cleveland DAQ) or the appropriate Ohio EPA 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 established sulfuric acid and PE rates established for this emissions unit. 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 an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's

"eBusiness Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

- (2) The permittee shall identify the following information in the annual permit evaluation report:
- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, water flow rate, or scrubber water supply pressure was outside of the appropriate range or exceeded the appropriate limit established in this permit;
  - b. any period of time (start time and date, end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;
  - c. each incident described above in "a" or "b" where a prompt investigation was not conducted;
  - d. each incident of deviation described above in "a" or "b" where prompt corrective action(s), that would bring the pressure drop, water flow rate, or scrubber water supply pressure into compliance within the acceptable range was determined to be necessary and corrective actions were not taken; and
  - e. each incident of deviation described above in "a" or "b" where proper records were not maintained for the investigation and/or corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emissions Limitation:  
Sulfuric acid (as PE) emissions shall not exceed 2.26 lbs/hour.  
  
Applicable Compliance Method:  
If required, compliance with the lb/hr limitation shall be demonstrated through emissions tests in accordance with USEPA Reference Methods 1 through 5 of 40 CFR Part 60, Appendix A for PE and Method 8 as described in Method 6 of 40 CFR Part 60, Appendix A for sulfuric acid.
  - b. Emissions Limitation:  
Sulfuric acid (as PE) emissions shall not exceed 9.9 TPY.  
  
Applicable Compliance Method:  
The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitation shall

be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emissions Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

- (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 within 6 months prior to the permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable concentration of sulfuric acid (as PE) in the exhaust stream.
  - c. The following test methods shall be employed to demonstrate compliance with the emission limitations: Methods 1 through 5 of 40 CFR Part 60, Appendix A for PE and Method 8 as described in Method 6 of 40 CFR Part 60, Appendix A for sulfuric acid. Visible emission reading, using USEPA Method 9, shall be performed during each test run.
  - d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).
  - f. Personnel from the appropriate Ohio EPA District Office or local air agency 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.

- g. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.

**2. P002, HCl picking line.**

**Operations, Property and/or Equipment Description:**

An HCl steel pickling line consisting of two pickling tanks and one circulation tank containing an aggregate 8,500-gallons of ambient temperature HCl. Pickling line controlled by a packed bed fume scrubber with water spray.

a) 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.

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(A)(3) (PTI 13-03631, issued 8/10/2000)	Hydrochloric acid (HCl) as particulate emissions (PE) shall not exceed 0.76 lbs/hr and 3.3 TPY from the stack serving this emissions unit.
b.	OAC rule 3745-17-07(A)	The visible particulate emissions from the stack serving this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by this rule.
c.	OAC rule 3745-17-11(B)(1)	The particulate emissions limitation established by this rule is less stringent than the particulate limitation established pursuant to OAC rule 3745-31-05(A)(3).

- (2) Additional Terms and Conditions
  - a. The emissions from this emissions unit shall be vented to the packed bed scrubber control device at all times when this emissions unit is in operation.
- c) Operational Restrictions
  - (1) The static pressure drop across the scrubber shall be continuously maintained at a value of not less than one or more than 2 inches water across the packing.
  - (2) The scrubber water flow rate shall be continuously maintained at a value not less than 120-gallons per minute.
  - (3) The pH of the scrubber liquor shall be maintained within the range of 6.0 to 9.0.
  - (4) The permittee shall follow the manufacturer's recommended maintenance, at the recommended intervals, on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to the exhaust system, scrubber fans, and motors associated with those pumps and fans.
  - (5) The scrubber internals and mist eliminators shall be cleaned at intervals sufficient to prevent buildup of solids or other fouling.
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall collect and record the following information each day:
    - a. the pressure drop across the scrubber in inches of water, on a twice-per-shift basis;
    - b. the scrubber water flow rate, in gallons per minute, on a twice-per-shift basis; and
    - c. the liquid pH on an hourly basis;
    - d. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
  - (2) The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber, the scrubber water flow rate in gallons per minute), and the pH for the scrubber employed for this emissions unit, while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

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:

    - a. the date and time the deviation began;
    - b. the magnitude of the deviation at that time;

- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of the 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 determined that a 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:

- f. a description of the corrective action;
- g. the date the corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time during which there was a deviation;
- j. the pressure drop, flow rate, and pH readings immediately after the corrective action(s) was/were implemented; and
- k. the name(s) of 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 3745-15-05 if it is determined that a malfunction has occurred.

The range(s) and/or limits 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 Cleveland Division of Air Quality (Cleveland DAQ) or the appropriate Ohio EPA 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 established HCl and PE emission rates for this emissions unit. 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 an administrative modification.

- (3) The permit to install 13-03631 for emissions unit P002 was evaluated based on the actual materials and the design parameters of the emission unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application, and modeling was performed for each toxic air contaminant emitted over one ton per year using an air dispersion model such as SCREEN 3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration

(MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A” as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarized the results of dispersion modeling for the significant toxic contaminants (emitted at one or more tons per year) or “worst case” toxic contaminants:

Toxic Contaminant: HCl

TLV (mg/m<sup>3</sup>): 5,159

Maximum Hourly Emission Rate (lbs/hr): 0.76

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 49.71

MAGLC (ug/m<sup>3</sup>): 122.8

The permittee, has demonstrated that the emission of HCl from emissions unit P002, is calculated to be less than eighty percent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest previously modeled;
  - b. changes in the composition of the materials, or the use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745 31 01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F). initially and for each change that requires re-evaluation of the toxic contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit or the materials applied.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Cleveland Division of Air Quality (Cleveland DAQ) by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA’s “eBusiness Center: Air Services” although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the annual permit evaluation report:
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber, water flow rate, or pH was outside of the appropriate range or exceeded the appropriate limit established in this permit;
  - b. any period of time (start time and date, end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;
  - c. each incident described above in “a” or “b” where a prompt investigation was not conducted;
  - d. each incident of deviation described above in “a” or “b” where prompt corrective action(s). that would bring the pressure drop, water flow rate, or pH into compliance with the acceptable range was determined to be necessary and were not taken; and
  - e. each incident of deviation described above in “a” or “b” where proper records were not maintained for the investigation and/ or corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

HCl (as PE) shall not exceed 0.76 lb/hr.

Applicable Compliance Method:

If required, compliance with the lb/hr emission limitation shall be demonstrated through emissions tests in accordance with USEPA Reference Methods 1-5 and 26 or 26A (as appropriate), of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

HCl (as PE) shall not exceed 3.3 tons/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emissions limitation by 8,760 hours of operation per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

c. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined through visible emission observation performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

## (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 within 6 months prior to the permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable concentration of hydrochloric acid (as PE) in the exhaust stream.
- c. The following test methods shall be employed to demonstrate compliance with the emission limitations: Methods 1 through 5 of 40 CFR Part 60, Appendix A for PE and Method 26 or 26A as described in Method 6 of 40 CFR Part 60, Appendix A for hydrochloric acid. Visible emission reading, using USEPA Method 9, shall be performed during each test run.
- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or

approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
- g. 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 appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) None.