



Environmental Protection Agency

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

10/12/2012

DENISE DOLCE LAKATOS  
DE NORA TECH INC., CHARDON  
464 Center street  
CHARDON, OH 44024-1067

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

Facility ID: 0228000094  
Permit Number: P0110956  
Permit Type: Initial Installation  
County: Geauga

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
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA-NEDO; Pennsylvania; Canada





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

De Nora Tech, Inc., Chardon facility (De Nora) is a manufacturer of electrochemistry-based products. The core of De Nora's technology and product lines are dimensionally stable anodes (DSA) and titanium metal substrates with electro catalytic coatings. The facility has three major process lines: etch lines, molten salt line, and coating line. This FEPTIO proposed to install a new PL etching operation (P024), which including an etching tank, a rinse tank, and a holding tank. Emissions from etching tank will be controlled by a scrubber with fresh water. This FEPTIO will restrict facility-wide HCl emissions to avoid being a "Major Source".

3. Facility Emissions and Attainment Status:

De Nora is located at 464 Center Street, Chardon, Geauga County, an area designated as "non-attainment" for ozone, and "attainment" for sulfur dioxide, PM<sub>2.5</sub>, carbon monoxide and lead. The facility is not a "Major Source" for criteria pollutants, and will not be a "Major Source" for HCl emissions, based upon rolling 12-month federal enforceable facility-wide emission restrictions. Therefore, the requirements of Title V and case-by-case MACT are not applicable to De Nora.

4. Source Emissions:

Currently, De Nora has two (2) permitted etch lines, North (P001) and South (P010) etching operations, Molten salt process (P011), a water based anode coating oven (P009), a DSA coating drying oven (P007), a dispatch oven (P006), a curing oven (P013), and a creep oven (P012). The facility is also permitted for a wheelabrator (P004) and a degreasing oven with afterburner (P023).

This FEPTIO proposes to install a new PL etching operation and also contains terms and conditions that restrict the facility-wide HCl emissions not to exceed 9.90 tons per year, based upon a rolling 12-month summation. De Nora is also required by this permit to track HCl emissions, keep records, and submit reports.

5. Conclusion:

The emission limits contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the applicable MACT and Title V thresholds will not be exceeded.

6. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	0.44
HCl <sub>facility-wide</sub>	9.90

PUBLIC NOTICE

10/12/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

DE NORA TECH INC., CHARDON

464 CENTER ST,

Chardon, OH 44024

Geauga County

FACILITY DESC.: Electroplating, Plating, Polishing, Anodizing, and Coloring

PERMIT #: P0110956

PERMIT TYPE: Initial Installation

PERMIT DESC: Installation and operation of a new PL Batch Acid Etch line which uses hydrochloric acid and consists of an acid etch tank, a rinse tank, and a holding tank. Emissions are controlled by a 50 gpm wet scrubber.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Tracy Gu, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



**Ohio**

**Environmental  
Protection Agency**

**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
DE NORA TECH INC., CHARDON**

Facility ID:	0228000094
Permit Number:	P0110956
Permit Type:	Initial Installation
Issued:	10/12/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
DE NORA TECH INC., CHARDON

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## Authorization

Facility ID: 0228000094

Application Number(s): A0045422, A0045797

Permit Number: P0110956

Permit Description: Installation and operation of a new PL Batch Acid Etch line which uses hydrochloric acid and consists of an acid etch tank, a rinse tank, and a holding tank. Emissions are controlled by a 50 gpm wet scrubber.

Permit Type: Initial Installation

Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 10/12/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

DE NORA TECH INC., CHARDON  
464 CENTER ST  
Chardon, OH 44024

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:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

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: P0110956

Permit Description: Installation and operation of a new PL Batch Acid Etch line which uses hydrochloric acid and consists of an acid etch tank, a rinse tank, and a holding tank. Emissions are controlled by a 50 gpm wet 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>P024</b>
Company Equipment ID:	PL001
Superseded Permit Number:	
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 Ohio EPA DAPC, Northeast District Office 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.

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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).

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

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) B.2.

2. Facility - Wide Emission Limitations

a) 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.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: a. OAC rule 3745-31-05(D)(1)(b) | See B.2.a)(2)a, B.2.a)(2)b and B.2.b)(1).

(2) Additional Terms and Conditions

- a. Facility-wide hydrochloric acid (HCl) emissions shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.
b. Emissions from each emissions unit P001, P007, P010, P011 and P024 shall be vented to a scrubber that shall meet the operational, monitoring and record keeping requirements of its permit when the associated emissions unit is in operation.

b) Operational Restrictions

- (1) To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the following emission levels specified in the following table for all emissions units combined:



Effective Date: To be entered upon final issuance

Month(s)	Maximum Allowable Cumulative Emissions of hydrochloride (HCl) acid (tons)
1	0.90
1 – 2	1.80
1 – 3	2.70
1 – 4	3.20
1 – 5	4.50
1 – 6	5.40
1 – 7	6.30
1 – 8	7.20
1 – 9	8.10
1 – 10	9.00
1 – 11	9.90
1 – 12	9.90

After the first 12 calendar months following the issuance of this permit, compliance with the annual HCl emissions shall be based upon a rolling, 12-month summation of the HCl emissions.

c) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records for each etching line, emissions unit P001, P010 and P024:

- a. HCl usage, defined as “U<sub>e</sub>”, in pounds;
- b. monthly HCl emissions, in pounds, and shall be calculated using the following equation:

$$E_e = (U_e)(L\%)(1 - C)$$

where:

E<sub>e</sub> = monthly HCl emissions from etching line, in pounds;

U<sub>e</sub> = total HCl usage, as recorded in section c)(1)a, in pounds;

$L_{\%}$  = percentage loss of HCl which emit to air, 20%, determined by the facility based upon mass balance calculation; and

$C$  = control efficiency of etching line scrubber, determined based upon most recent stack test.

- (2) The permittee shall maintain the following monthly records for emissions unit P007:
- a. monthly operating hours, defined as " $H_d$ ", in hours; and
  - b. monthly HCl emissions, in pounds, and shall be calculated using the following equation:

$$E_D = (E_{dh})(H_d)$$

where:

$E_D$  = monthly HCl emissions from emissions unit P007;

$E_{dh}$  = maximum hourly HCl emissions from emissions unit P007, 0.551 pounds per hour. It can also be determined by a stack test, if requested by Ohio EPA; and

$H_d$  = total operating hours for the month, as recorded in c)(2)a, in hours.

- (3) The permittee shall maintain the following monthly records for emissions unit P011:
- a. monthly operating hours, defined as " $H_M$ ", in hours; and
  - b. monthly HCl emissions, in pounds, and shall be calculated using the following equation:

$$E_M = (E_{mh})(H_M)$$

where:

$E_M$  = monthly HCl emissions from emissions unit P011;

$E_{mh}$  = hourly HCl emissions from emissions unit P011, determined by most recent stack test; and

$H_M$  = total operating hours for the month, as recorded in c)(3)a, in hours.

- (4) The permittee shall maintain the following facility-wide information each month:
- a. the monthly facility-wide HCl emissions, in tons per month; and
  - b. the rolling, 12-month summation of facility-wide HCl emissions, in tons.

## d) Reporting Requirements

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

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. an identification of each month, during the first 12 calendar months following the issuance of this permit, when the facility-wide cumulative HCl emissions for the month exceeded the limitation in B.2.b)(1), and the actual facility-wide cumulative HCl emissions for each such month;
  - ii. an identification of each month, after the first 12 calendar months following the issuance of this permit, during which the rolling, 12-month facility-wide HCl emissions exceeded 9.9 tons, and the actual rolling, 12-month facility-wide HCl emissions for each such month;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (Ohio EPA Northeast District Office).

## e) Testing Requirements

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

a. Emission Limitation:

Facility-wide HCl emissions shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in c)(4)b.



- (2) The permittee shall conduct emission testing for emissions units P011 and P024 in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months after final issuance of this permit.
  - b. The emission testing shall be conducted to demonstrate the maximum HCl emission rate, in the appropriate averaging period.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 26A of 40 CFR Part 60, Appendix A.
  - 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 Ohio EPA Northeast District Office. 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 Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northeast District Office's refusal to accept the results of the emission test(s).
  - f. Personnel from the Ohio EPA Northeast 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.
  - 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 Ohio EPA Northeast 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 Northeast District Office.
- f) Miscellaneous Requirements
  - (1) None.

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



**1. P024, PL001**

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

PL Batch Acid Etch line using hydrochloric acid consists of an etch tank, a rinse tank, and a holding tank. Emissions are controlled by a 50 gpm wet scrubber.

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) as effective 11/30/2001	Particulate emissions from this emissions unit shall not exceed 0.10 pound per hour and 0.44 ton per year.  See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(A)(3) as effective 12/01/2006	See b)(2)c.
c.	OAC rule 3745-17-07(A)	The visible particulate emissions from the stacks associate with this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-11	Particulate emissions from this emissions unit shall not exceed 0.551 pound per hour.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply: b)(1)a, b)(2)a, f)(1)a and f)(1)b.
- b. The emissions from this emissions unit shall be vented to a wet scrubber at all times when this emissions unit is in operation.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the uncontrolled potential to emit for particulate emissions is less than 10 tons/year.

c) Operational Restrictions

- (1) None.

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 and the scrubber liquid flow rate 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 collect and record the following information each day when this emissions unit was in operation:
- a. the wet scrubber water flow rate, in gallons per minute;
- b. the pressure drop across the scrubber; and
- c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

## e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify in the annual PER the following information concerning the operations of the wet scrubber during the 12-month reporting period for this/these emissions unit(s):
  - a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
  - b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;
  - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
  - e. each incident of deviation described in "a" or "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.

## f) Testing Requirements

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

Particulate emissions from this emissions unit shall not exceed 0.10 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

b. Emission Limitation:

Particulate emissions from this emissions unit shall not exceed 0.44 ton per year.

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.10 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance is demonstrated with the annual emission limitation.

c. Emission Limitation:

The visible particulate emissions from the stacks associate with this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated by visible emission evaluations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

d. Emission Limitation:

Particulate emissions from this emissions unit shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.