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

12/10/2012

Certified Mail

Facility ID: 0302000001
Permit Number: P0110372
County: Allen

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

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is a finalOhio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this Title V permit 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
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

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. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office as indicated on page one of your permit.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office

FINAL

Division of Air Pollution Control
Title V Permit
for
Chemtrade Logistics Inc

Facility ID:	0302000001
Permit Number:	P0110372
Permit Type:	Renewal
Issued:	12/10/2012
Effective:	12/31/2012
Expiration:	12/31/2017

Division of Air Pollution Control
Title V Permit
for
Chemtrade Logistics Inc

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Scheduled Maintenance 6
4. Risk Management Plans 6
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 8
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 11
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 12
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting 15
28. Permit Transfers 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15

B. Facility-Wide Terms and Conditions..... 16

C. Emissions Unit Terms and Conditions 18

1. P001, Acid-Plant 19

2. Emissions Unit Group - Cooling Towers: P008, P009, P010 31

Authorization

Facility ID:	0302000001
Facility Description:	Sulfuric Acid Production
Application Number(s):	A0044307, A0045227
Permit Number:	P0110372
Permit Description:	Title V Renewal Permit for Sulfuric Acid Production Plant
Permit Type:	Renewal
Issue Date:	12/10/2012
Effective Date:	12/31/2012
Expiration Date:	12/31/2017
Superseded Permit Number:	P0107676

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

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

Ohio Environmental Protection Agency (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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

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

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(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 paragraph (E) of OAC rule 3745-77-03.

(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.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

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

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.

   a) L001 – Parts Washer;

   b) T005 – Tank #16, Sulfuric Acid Storage Tank (PTI #03-8470); and

   c) T006 – Tank #17, Sulfuric Acid Storage Tank (PTI #03-8470)

   [Authority for term: OAC 3745-77-07(A)(13)]

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 packed bed scrubber

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) [PTI #P0111031, modification issued 9/20/2012]	750 lbs sulfur dioxide (SO_2)/day 86.7 tons SO_2/yr
b.	OAC rule 3745-31-05(A)(3) [PTI #P0111031, modification issued 9/20/2012]	1.56 lbs sulfuric acid (H_2SO_4) mist/hour 6.84 tons H_2SO_4 mist/yr 3.0 lbsSO_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

a. 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].

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

c. 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.

d. 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.

e. 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.

f. 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.

g. 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.

[OAC rule 3745-77-07(A)(1) and PTI #P0111031]

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.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

(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:

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 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:

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 (in minutes) during which there was a deviation;

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

k. 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

(3) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous SO_2 monitoring system has been certified to meet the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 2. The letter/document of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

[OAC rule 3745-77-07(C)(1)]

(4) The permittee shall 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 all data obtained by the continuous SO_2 monitoring system including, but not limited to:

a. emissions ofSO_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.

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

(5) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous O_2 monitoring system has been certified to meet the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 3. The letter/document of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

[OAC rule 3745-77-07(C)(1)]

(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.

All valid data points generated and recorded by the continuous O_2 monitoring and data acquisition and handling system shall be used in the calculation of the O_2 concentration over the appropriate averaging period.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

(7) In addition to any requirements in the Consent Decree, the permittee 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 exceedance 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

(8) The permittee 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

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)(1)a. or e)(1)b. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(1)a. or e)(1)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)(1)a.or e)(1)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.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

(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 31, April 30, July 31, and October 31 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

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

(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 31, April 30, July 31, and October 31 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

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

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: 750 lbsSO_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 the equations listed in Appendix F of the Federal Consent Decree #3:09-cv-00067-JGC, filed on 4/2/09.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

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

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

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

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

Applicable Compliance Method: Compliance with the SO_2emission limitation above 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

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.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

(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.

[OAC rule 3745-77-07(C)(1)]

(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.

[OAC rule 3745-77-07(C)(1)]

(4) 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

(5) 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.

[OAC rule 3745-77-07(C)(1) and PTI #P0111031]

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Cooling Towers: P008, P009, P010

EU ID	Operations, Property and/or Equipment Description
P008	non contact water cooling tower CT 9001A
P009	non contact water cooling tower CT 9001B
P010	non contact water cooling tower CT 9001C

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(A)(3) (PTI #03-13573, issued 07/24/2001)	0.68 lb particulate emissions (PE)/hr; 2.98 tons PE/yr from each emissions unit individually See b)(2)b.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)	See b)(2)a.

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

c) Operational Restrictions

(1) The permittee shall not exceed a total dissolved solids content of 4,500 mg/l in the cooling water for each emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI #03-13573]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall test and record the total dissolved solids content (mg/l) of the cooling water on a once per shift basis for each emissions unit. The permittee shall use the following procedure to measure the amount of dissolved solids:

a. Take a sample of the water once every shift.

b. Determine the concentration of the total dissolved solids by measuring the conductivity (using a conductivity meter) of the cooling water, in micro siemens/cubic cm.*

The conductivity meter shall be calibrated and operated in accordance with manufacturer's specifications and recommendations.

*The conductivity meter shall be calibrated such that 1 micro siemen/cubic cm equals 1 mg/l of total dissolved solids.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports identify all exceedances of the total dissolved solids content restriction of 4,500 mg/l. These quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13573]

f) Testing Requirements

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

a. <u>Emission Limitation</u>: 0.68 lb PE/hr from each emissions unit individually

<u>Applicable Compliance Method</u>: Compliance with the lb/hr PE limitation may be determined by multiplying the maximum water flow rate (90,000 gallons/hr) by the maximum dissolved solids level (4,500 mg/l), and by the maximum drift loss factor (0.0002*), and then by a conversion factor of 0.0000083.**

If required, the permittee shall measure the maximum drift loss factor of 0.0002 in accordance with approved Ohio EPA methods and procedures.

*based on the manufacturer's rating

**this factor converts milligrams into lbs and liters into gallons

[OAC rule 3745-77-07(C)(1) and PTI #03-13573]

b. Emission Limitation: 2.98 tons PE/yr from each emissions unit individually

Applicable Compliance Method: The annual PE limitation was developed by multiplying the lb/hr PE limitation by 8,760; and then dividing by 2,000. Therefore, provided compliance is shown with the lb/hr PE limitation, compliance with the annual PE limitation shall also be demonstrated.

[OAC 3745-77-07(C)(1) and PTI #03-13573]

c. Emission Limitation: Visible PE shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #03-13573]

g) Miscellaneous Requirements

(1) None.