



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
WOOD COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-16196

Fac ID: 0387000088

DATE: 10/26/2004

Jones-Hamilton Company
Ray Hahn
30354 Tracy Road
Walbridge, OH 434659792

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

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

cc: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/26/2004
Effective Date: 10/26/2004**

FINAL PERMIT TO INSTALL 03-16196

Application Number: 03-16196
Facility ID: 0387000088
Permit Fee: **\$500**
Name of Facility: Jones-Hamilton Company
Person to Contact: Ray Hahn
Address: 30354 Tracy Road
Walbridge, OH 434659792

Location of proposed air contaminant source(s) [emissions unit(s)]:
**30354 Tracy Road
Walbridge, Ohio**

Description of proposed emissions unit(s):
Modification to PTI 03-06511 to change maximum allowable concentrations.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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.

4. 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.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
HCl	0.74
PE	0.88

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - sodium bisulfate packaging and bulk loading with impingement scrubber	OAC rule 3745-31-05 (A)(3)	0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year See A.2.a and A.2.b.
	OAC rule 3745-17-11 (B)	See A.2.c.
	OAC rule 3745-17-07 (A)	Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of an impingement scrubber. The impingement scrubber shall achieve a 90% control efficiency for PE (100% capture).
- 2.b The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 (A).
- 2.c 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. Operational Restrictions

1. The scrubber water supply pressure shall be continuously maintained at a value of not less than 20 pounds per square inch (gauge) at all times while the emissions unit is in operation.

2. The scrubber water flow rate shall be continuously maintained at a value of not less than 5 gallons per minute at all times while the emissions unit is in operation.
3. The maximum weight percent of sodium bisulfate in the scrubber liquor shall never exceed 29 percent.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor and record the water supply pressure and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the water supply pressure, in pounds per square inch (gauge);
 - b. the scrubber water flow rate, in gallons per minute; and
 - c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall collect and record the weight percent of sodium bisulfate in the scrubber liquor each day in accordance with the testing requirements specified in Section E.1.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels specified above:
 - a. the water supply pressure; and
 - b. the scrubber water flow rate.
2. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all periods of time during which the concentration of sodium bisulfate in the scrubber liquor exceeded 29 percent, by weight.

E. Testing Requirements

1. The permittee shall collect and perform a titration on the scrubber liquor, once per day, to determine the concentration (weight percent) of the sodium bisulfate in the liquor.
2. Compliance with the emission limitations specified in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.10 pound PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance by applying a particulate emission control efficiency of 90 percent for use of an impingement scrubber to an uncontrolled mass emission rate of 1.00 pound/hour. If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
0.44 ton PE/year

Applicable Compliance Method:

The annual emission limitation was developed by multiplying the pound/hour emission limitation by the maximum operating schedule of 8,760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

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

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitation shall be determined in accordance with OAC rule 3745-17-03 (B).

F. Miscellaneous Requirements

1. The terms and conditions of this permit shall supersede all of the air pollution control requirements contained in Permit to Install (PTI) application number 03-11287 which was issued on April 22, 2004.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P006 - sodium bisulfate cooling and screening with impingement scrubber	OAC rule 3745-31-05 (A)(3)	0.10 pound particulate emissions (PE)/hour, 0.44 ton PE/year See A.2.a and A.2.b.
	OAC Rule 3745-17-11 (B)	See A.2.c.
	OAC Rule 3745-17-07 (A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

2. Additional Terms and Conditions

- Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of an impingement scrubber. The impingement scrubber shall achieve a 90% control efficiency for PE (100% capture).
- The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 (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. Operational Restrictions

- The scrubber water supply pressure shall be continuously maintained at a value of not less than 20 pounds per square inch (gauge) at all times while the emissions unit is in operation.

2. The scrubber water flow rate shall be continuously maintained at a value of not less than 5 gallons per minute at all times while the emissions unit is in operation.
3. The maximum weight percent of sodium bisulfate in the scrubber liquor shall never exceed 29 percent.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor and record the water supply pressure and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the water supply pressure, in pounds per square inch (gauge);
 - b. the scrubber water flow rate, in gallons per minute; and
 - c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall collect and record the weight percent of sodium bisulfate in the scrubber liquor each day in accordance with the testing requirements specified in Section E.1.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels specified above:
 - a. the water supply pressure; and
 - b. the scrubber water flow rate.
2. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all periods of time during which the concentration of sodium bisulfate in the scrubber liquor exceeded 29 percent, by weight.

E. Testing Requirements

1. The permittee shall collect and perform a titration on the scrubber liquor, once per day, to determine the concentration (weight percent) of the sodium bisulfate in the liquor.

2. Compliance with the emission limitations specified in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.10 pound PE/hour

Applicable Compliance Method:

The permittee shall demonstrate compliance by applying a particulate emission control efficiency of 90 percent for use of an impingement scrubber to an uncontrolled mass emission rate of 1.00 pound/hour. If required, compliance with the particulate emission limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
0.44 ton PE/year

Applicable Compliance Method:

The annual emission limitation was developed by multiplying the pound/hour emission limitation by the maximum operating schedule of 8,760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured.

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

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitation shall be determined in accordance with OAC rule 3745-17-03 (B).

F. Miscellaneous Requirements

1. The terms and conditions of this permit shall supersede all of the air pollution control requirements contained in Permit to Install (PTI) application number 03-13491 which was issued on April 22, 2004.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T002 - fixed-roof, hydrochloric acid storage tank with submerged fill and a scrubber (T-510)	OAC rule 3745-31-05 (A)(3)	combined emission limitations for emissions units T002 and T003: 4.06 pounds hydrochloric acid (HCl)/day, 0.74 ton HCl/year See A.2.a.

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of an impingement scrubber. The impingement scrubber shall achieve a 99% control efficiency for HCl emissions.

B. Operational Restrictions

1. The scrubber water supply shall be continuously maintained at a value of not less than 10 pounds per square inch (gauge) at all times while the emissions unit is in operation.
2. The scrubber water flow rate shall be continuously maintained at a value of not less than 11 gallons per minute at all times while the emissions unit is in operation.
3. The maximum weight percent of HCl in the scrubber liquor shall never exceed 10 percent.
4. The concentration of the HCl stored in emissions units T002 and T003 shall never exceed 36.9 percent, by weight.

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Emissions Unit ID: **T002**

5. The total amount of HCl unloaded and pumped to emissions units T002 and T003, combined, shall never exceed 153,000 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor and record the water supply pressure and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the water supply pressure, in pounds per square inch (gauge);
 - b. the scrubber water flow rate, in gallons per minute; and
 - c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall collect and record the weight percent of HCl in the scrubber liquor each day in accordance with the testing requirements specified in Section E.1.
 3. For each day during which the concentration of the HCl stored in emissions units T002 and/or T003 exceeds 36.9 percent, by weight, the permittee shall maintain a record of the concentration (percent by weight) of the material stored in the emissions unit(s).
 4. The permittee shall maintain daily records indicating the total number of gallons of HCl transferred into emissions units T002 and T003, combined.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels specified above:
 - a. the water supply pressure; and
 - b. the scrubber water flow rate.
2. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all periods of time during which the concentration of HCl in the scrubber liquor exceeded 10 percent, by weight.

3. The permittee shall submit deviation (excursion) reports that identify each day when the concentration of HCl stored in emissions units T002 and/or T003 exceeded 36.9 percent, by weight. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record indicating an exceedance of the total number of gallons of HCl transferred into emissions units T002 and T003, combined. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

E. Testing Requirements

1. The permittee shall collect and perform a titration on the scrubber liquor, once per day, to determine the concentration (weight percent) of the HCl in the liquor.
2. Compliance with the emission limitations specified in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Combined limitation for emissions units T002 and T003
4.06 pounds HCl/day

Applicable Compliance Method:

The emission limitation was established by applying a 99% control efficiency for use of a scrubber to a maximum uncontrolled emission rate of 405.92 pounds HCl vapors/day from emissions units T002 and T003, combined. The uncontrolled emission rate was based on a maximum HCl concentration of 36.9 percent, by weight for the material transferred to the storage tanks and a maximum HCl transfer rate of 153,000 gallons/day for emissions units T002 and T003, combined. Therefore provided compliance is shown with the maximum HCl concentration requirement for the material transferred and the maximum HCl transfer rate, compliance with the daily limitation will be assumed.

If required, the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods 1 through 4 and 26 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation: Combined limitation for emissions units T002 and T003
0.74 ton HCl/year

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Emissions Unit ID: **T002**

Applicable Compliance Method:

The annual emission limitation was established by multiplying the combined, daily HCl emission limit by 365 days/year and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the daily emission limit, compliance with the annual emission limit shall be assumed.

F. Miscellaneous Requirements

1. The terms and conditions of this permit shall supersede all of the air pollution control requirements contained in Permit to Install (PTI) application number 03-06511 which was issued on July 29, 1992.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T003 - fixed-roof, hydrochloric acid storage tank with submerged fill and a scrubber (T-520)	OAC rule 3745-31-05 (A)(3)	combined emission limitations for emissions units T002 and T003: 4.06 pounds hydrochloric acid (HCl)/hour, 0.74 ton HCl/year See A.2.a.

2. Additional Terms and Conditions

- Best available technology (BAT) for this emissions unit has been determined to be the use of an impingement scrubber. The impingement scrubber shall achieve a 99% control efficiency for HCl emissions.

B. Operational Restrictions

- The scrubber water supply shall be continuously maintained at a value of not less than 10 pounds per square inch (gauge) at all times while the emissions unit is in operation.
- The scrubber water flow rate shall be continuously maintained at a value of not less than 11 gallons per minute at all times while the emissions unit is in operation.
- The maximum weight percent of HCl in the scrubber liquor shall never exceed 10 percent.
- The concentration of the HCl stored in emissions units T002 and T003 shall never exceed 36.9 percent, by weight.

5. The total amount of HCl unloaded and pumped to emissions units T002 and T003, combined, shall never exceed 153,000 gallons per day.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate and maintain equipment to monitor and record the water supply pressure and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. the water supply pressure, in pounds per square inch (gauge);
 - b. the scrubber water flow rate, in gallons per minute; and
 - c. the operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
2. The permittee shall collect and record the weight percent of HCl in the scrubber liquor each day in accordance with the testing requirements specified in Section E.1.
 3. For each day during which the concentration of the HCl stored in emissions units T002 and/or T003 exceeds 36.9 percent, by weight, the permittee shall maintain a record of the concentration (percent by weight) of the material stored in the emissions unit(s).
 4. The permittee shall maintain daily records indicating the total number of gallons of HCl transferred into emissions units T002 and T003, combined.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels specified above:
 - a. the water supply pressure; and
 - b. the scrubber water flow rate.
2. The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all periods of time during which the concentration of HCl in the scrubber liquor exceeded 10 percent, by weight.

3. The permittee shall submit deviation (excursion) reports that identify each day when the concentration of HCl stored in emissions units T002 and/or T003 exceeded 36.9 percent, by weight. Each report shall be submitted within 30 days after the deviation occurs.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record indicating an exceedance of the total number of gallons of HCl transferred into emissions units T002 and T003, combined. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

E. Testing Requirements

1. The permittee shall collect and perform a titration on the scrubber liquor, once per day, to determine the concentration (weight percent) of the HCl in the liquor.
2. Compliance with the emission limitations specified in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: Combined limitation for emissions units T002 and T003
4.06 pounds HCl/hour

Applicable Compliance Method:

The emission limitation was established by applying a 99% control efficiency for use of a scrubber to a maximum uncontrolled emission rate of 405.92 pounds HCl vapors/day from emissions units T002 and T003, combined. The uncontrolled emission rate was based on a maximum HCl concentration of 36.9 percent, by weight for the material transferred to the storage tanks and a maximum HCl transfer rate of 153,000 gallons/day for emissions units T002 and T003, combined. Therefore provided compliance is shown with the maximum HCl concentration requirement for the material transferred and the maximum HCl transfer rate, compliance with the daily limitation will be assumed.

If required, the control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods 1 through 4 and 26 of 40 CFR Part 60, Appendix A.

- b. Emission Limitation: Combined limitation for emissions units T002 and T003
0.74 ton HCl/year

Applicable Compliance Method:

The annual emission limitation was established by multiplying the combined, daily HCl emission limit by 365 days/year and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the daily emission limit, compliance with the annual emission limit shall be assumed.

F. Miscellaneous Requirements

1. The terms and conditions of this permit shall supersede all of the air pollution control requirements contained in Permit to Install (PTI) application number 03-06511 which was issued on July 29, 1992.