

Facility ID: 0630010015 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0630010015 Emissions Unit ID: P006 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

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

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Sulfonation Process No. 2 (Ballestra) controlled with ESP, acid scrubber, caustic scrubber, and Brink filter	OAC rule 3745-31-05(A)(3) PTI 06-3980 Issued 1/12/1994	Sulfur dioxide (SO ₂) emissions shall not exceed 2.2 lbs/hr, except during start-up (see A.2.a below). SO ₂ emissions shall not exceed 12.4 lbs/hr during start-up . Particulate emissions (PE) shall not exceed 3.1 lbs/hr.
	OAC rule 3745-17-07(A)(1)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1). Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(2) OAC rule 3745-18-06(E)(2)	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) Start-up is defined as the period between when the emissions unit is initially started until the associated SO₂-SO₃ converter beds reach the normal operating temperature of 800 degrees Fahrenheit.

B. Operational Restrictions

1. The caustic (SO₂) scrubber water flow rate shall be maintained at a value of not less than 400 gallons per minute.
2. The acid (SO₃) scrubber water flow rate shall be maintained at a value of not less than 290 gallons per minute during start-up and standby (non-sulfonation) operations.
3. The pH of the caustic scrubber liquor shall be maintained within the range of 10.0 to 14.0 S.U.
4. The conductivity of the acid scrubber liquor shall be maintained within the range of 96.0 to 98.5% sulfuric acid.
5. Operation of the control equipment outside of the ranges specified above does not necessarily indicate a mass emission limitation violation. If required by the Ohio EPA, SEDO, compliance with the mass emission limitation shall be determined by performing mass emission tests, using USEPA-approved methods and procedures. The results of any required emission tests shall be used in determining whether or not the operation of the control equipment outside of the ranges specified above is indicative of a possible violation of the mass emission limitation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the caustic and acid scrubber water flow rates, the pH of the caustic scrubber liquor, and the conductivity of the acid scrubber liquor while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- (a) the caustic scrubber water flow rate, in gallons per minute, on a daily basis;
- (b) the acid scrubber water flow rate, in gallons per minute, on a daily basis;
- (c) the pH of the caustic scrubber liquor, in S.U., on a daily basis;
- (d) the conductivity of the acid scrubber liquor, in % sulfuric acid, on a daily basis; and
- (e) a log or record of operating time for the capture (collection) system, control devices, monitoring equipment, and the associated emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at the required levels:
 - (a) the caustic scrubber water flow rate;
 - (b) the acid scrubber water flow rate;
 - (c) the caustic scrubber liquor pH; and/or
 - (d) the acid scrubber liquor conductivity.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:

SO2 emissions shall not exceed 2.2 lbs/hr, except during start-up.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be demonstrated through the most recent emission test.

If required, the permittee shall demonstrate compliance with the lbs/hr emission limitation through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.
Emission Limitation:

SO2 emissions shall not exceed 12.4 lbs/hr during start-up.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be demonstrated through the most recent emission test.

If required, the permittee shall demonstrate compliance with the lbs/hr emission limitation through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.
Emission Limitation:

PE shall not exceed 3.1 lbs/hr.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be demonstrated through the most recent emission test.

If required, the permittee shall demonstrate compliance with the lbs/hr emission limitation through emission testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.
Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. None