

Facility ID: 1431350817 Issuance type: Title V Preliminary Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. 40 CFR, Part 68 is an applicable requirement for this facility. The permittee shall submit a Risk Management Plan, pursuant to 40 CFR, Part 68, to the appropriate designated agency and comply with all appropriate subparts by no later than June 20, 1999.

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 - 6.3 MMBTU/Hr Gas Fired Boiler (Package Boiler)
B002 - 2.34 MMBTU/Hr #2 Oil Fired Boiler (No. 2 Package Boiler)
B003 - 6.3 MMBTU/Hr #2 Oil Fired Boiler
B004 - 512 KVA Back-up Power Generator (Back-up Generator)
P002 - Sulfuric Acid Loading Equipment (Barge Dock)
P003 - Sulfuric Acid Loading Facility (65% Oleum Truck Spot)
P004 - Sulfuric Acid Loading Facility (#1 SO3 Truck Spot)
P005 - Sulfuric Acid Loading Facility (#2 SO3 Truck Spot)
P006 - Sulfuric Acid Loading Facility (#3 SO3 Truck Spot)
P007 - Sulfuric Acid Loading Facility (Tank Truck Rack)
P008 - Sulfuric Acid Loading Facility (#7 Tank Car Spot)
P009 - Sulfuric Acid Loading Facility (#8 Tank Car Spot)
P010 - Sulfuric Acid Loading Facility (#12 Tank Car Spot)
T001 - Sulfuric Acid Storage Tank (Tank #1)
T002 - Sulfuric Acid Storage Tank (Tank #2)
T003 - Oleum Storage Tank (Tank #3)
T004 - Sulfuric Acid Storage Tank (Tank #4)
T005 - Oleum Storage Tank (Tank #5)
T006 - Oleum Storage Tank (Tank #6)
T007 - Sulfuric Acid Storage Tank (Low Iron Tank)
T008 - Sulfuric Acid Storage Tank (Blend Tank)
T009 - Oleum Storage Tank 138 Ton Capacity (65 Make Tank)
T010 - Liquid SO3 Storage Tank 84 Ton Capacity (North SO3 Tank)
T011 - Liquid SO3 Storage Tank 256 Ton Capacity (South SO3 Tank)
T012 - 1,225,000 Gallon Sulfur Storage Tank (Sulfur Storage Tank)
T013 - 40,000 Gallon Liquid SO3 Storage Tank (East SO3 Tank)

Each insignificant emissions unit at this facility must comply with any applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431350817 Emissions Unit ID: P001 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

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.

I. 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>
Sulfuric Acid Production Process (greater than 300 tons per day)	OAC 3745-17-07	Visible particulate emissions from this emissions unit shall not exceed twenty percent opacity, as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.
-	OAC 3745-17-11	Particulate emissions shall not exceed 47.14 lbs/hr.
-	OAC 3745-18-37(KK)	Sulfur dioxide (SO2) emissions shall not exceed 25.0 lbs/ton of 100% sulfuric acid produced.
		See T&C A.I.2.

2. Additional Terms and Conditions

- a. Stack height shall be no lower than 300 feet above ground level.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a process monitoring system which continuously measures and records the SO2 concentration [in parts per million (ppm)] and the oxygen (O2) concentration [in percent (%) of the exhaust] in the stack for this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
2. A statement of certification of the continuous SO2 monitor shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2. Proof of certification shall be made available to the Director upon request.
3. The permittee shall keep hourly records of sulfuric acid production, in tons of 100% sulfuric acid produced per hour (TPH).
4. The permittee shall keep daily records of the SO2 emission rate, in lbs/ton of 100% sulfuric acid produced for each 3-hour block of time.

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IV. Reporting Requirements

1. Pursuant to OAC rule 3745-15-04, ORC sections 3704.03(I) and 3704.031, the permittee shall submit excess emission reports for this emissions unit. Each excess emission report shall include the following:
 - a. the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of any exceedance of the 25 lbs SO₂ per ton of 100% sulfuric acid produced emission limit for each 3-hour block of time;
 - b. the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions; and
 - c. the total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line.

Each excess emission report shall be submitted within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency. If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.

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V. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Visible particulate emission limitation

Compliance shall be determined by visible emission evaluations performed in accordance with procedures specified in OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.
 - b. 47.14 lbs/hr of particulate emissions

Either multiply the particulate emissions factor of 0.081 lb/ton of 100% sulfuric acid produced (from the stack test performed on September 14, 1993) by the maximum hourly production rate or perform an emission test pursuant to OAC rule 3745-17-03(B)(10).
 - c. 25.0 lbs of sulfur dioxide per ton of 100% sulfuric acid produced.

Compliance shall be based upon the process monitoring system data and the hourly production data and shall be determined by calculating the average 3-hour emission rate in lbs/ton of 100% acid produced using the method outlined in 40 CFR 60.84(d), or an alternate method as outlined in 40 CFR 60.84(b).

Compliance with the SO₂ emission limitation also shall be demonstrated by the applicable test methods and procedures specified in OAC rule 3745-18-04(C).
2. The permittee shall conduct, or have conducted, particulate matter (PM) and SO₂ emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 3 months of permit issuance, approximately 2.5 years after permit issuance, and within 6 months prior to permit renewal.
 - b. The emission testing shall be conducted to demonstrate compliance with the 25 lbs. of SO₂ per ton of 100% sulfuric acid produced and the 47.14 lbs of PM per hour emission limits.
 - c. The following test method(s) shall be employed to demonstrate compliance:
 - i. for SO₂, Method 8 of 40 CFR Part 60, Appendix A.
 - ii. for PM, Method 5 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 appropriate Ohio EPA District Office or local air agency. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1431350817 Emissions Unit ID: P001 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

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.

I. 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>
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Sulfuric Acid Production Process (>300 TPD)		
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2. Additional Terms and Conditions

- 1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None