

Facility ID: 1576131877 Issuance type: Title V 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. Risk Management Plans: If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:
 - B005 - wide line boiler;
 - B006 - wide line boiler;
 - F001 - roadways;
 - T018 - 10,000-gallon nitric acid tank vented to acid scrubber water tank;
 - T020 - 18,000-gallon anhydrous ammonia tank supply to SCR unit*;
 - Z002 - 500 kw emergency diesel generator**; and
 - Z016 - space heaters and small gas units.

Each insignificant emissions unit at this facility must comply with all 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.

* This T020 anhydrous ammonia tank is on the EHS list, vapor pressure 10 mmHg or greater, and has as an applicable requirement in OAC Chapter 3745-104 (Accidental Release Prevention Program), taking into account administrative controls that limit the maximum quantity. During an OEPA RMP Facility Audit Report of 04/02/02, the permittee stated that the controls are that the tank is only being filled to an 8,000-pound capacity.

**The OAC rule 3745-31-03(A)(4)(a) permit-by-rule exemption applies provided that monthly records are maintained for the rolling, 12-month hours of operation, the type of fuel used, and the sulfur content, by weight, of the fuel oil used.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576131877 Emissions Unit ID: P042 Issuance type: Title V 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> |
|--|--|---|
| shot blaster - Pangborn, wide line, controlled with a Mikro-Pulsaire fabric filter | OAC rule 3745-31-05(A)(3) (PTI 15-1166) | 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases 2.89 lbs/hr of particulate emissions 12.66 tpy of particulate emissions |
| | OAC rule 3745-17-07(A) | The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). 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)(1) | See section A.I.2.a. |

2. Additional Terms and Conditions

- a. The particulate emission limitation required by OAC rule 3745-17-11 is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05.

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 5.0 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on an hourly basis when the emissions unit is in operation.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in section A.II.1.

2. Deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.I.c.
3. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702, (330) 489-3385.

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V. **Testing Requirements**

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

20% opacity as a 6-minute average

Applicable Compliance Method:

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).
 - b. Emission Limitations:

0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases

2.89 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the stack testing requirements specified in section A.V.2 and the methods and procedures specified in OAC rule 3745-17-03(B)(10).
 - c. Emission Limitation:

12.66 tpy of particulate emissions

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly particulate emission limitation (2.89 lbs/hr) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
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 after issuance of the permit when required.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for particulates and visible particulate emissions. Additionally, the pressure drop range across the baghouse shall be recorded and compared to the 2.0 to 5.0 inches of water operational requirement.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable particulate mass emission rate: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A; and for visible particulate emissions, Method 9 of 40 CFR Part 60, Appendix A.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity of 21.0 tons per hour, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. 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 CCHD, APCD's refusal to accept the results of the emission test(s).

Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1576131877 Emissions Unit ID: P042 Issuance type: Title V 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> |
|---|--------------------------------------|--|
|---|--------------------------------------|--|

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

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576131877 Emissions Unit ID: P043 Issuance type: Title V 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> |
|--|--------------------------------------|--|
| annealing furnace, wide line; 48.0 mmBtu/hr; custom design, natural gas-fired with ultra-low NOx burners | OAC rule 3745-31-05(A)(3) | 0.286 lb/hr of particulate emissions |
| | (PTI 15-1166) | 1.25 tpy of particulate emissions |
| | | 0.03 lb/hr of sulfur dioxide (SO2) |
| | | 0.13 tpy of SO2 |
| | | 3.185 lbs/hr of nitrogen oxides (NOx) |
| | | 13.95 tpy of NOx |
| | | 2.33 lbs/hr of carbon monoxide (CO) |
| | | 10.21 tpy of CO |
| | OAC rule 3745-17-07(A) | See section A.I.2.a. |
| | OAC rule 3745-17-11 | See section A.I.2.b. |
| | OAC rule 3745-18-06(E) | See section A.I.2.c. |

2. Additional Terms and Conditions

- a. The permittee shall employ ultra-low NOx burners with this emissions unit whenever the emissions unit is in operation.
- b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight, as defined in OAC rule 3745-17-01(B)(14), is equal to zero.

This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.
- c. The sulfur dioxide (SO2) limitation required by OAC rule 3745-18-06(E) is less stringent than the sulfur dioxide limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

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II. Operational Restrictions

1. The permittee shall burn only natural gas as fuel in this emissions unit.

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III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702, (330) 489-3385.

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.286 lb/hr of particulate emissions
Applicable Compliance Method:
If required, compliance shall be demonstrated based upon the emission testing procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.
 - b. Emission Limitation:
0.03 lb/hr of SO₂
Applicable Compliance Method:
If required, compliance shall be demonstrated based upon the emission testing procedures specified in 40 CFR Part 60, Appendix A, Method 6.
 - c. Emission Limitation:
3.185 lbs/hr of NO_x
Applicable Compliance Method:
Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2.
 - d. Emission Limitation:
2.33 lbs/hr of CO
Applicable Compliance Method:
If required, compliance shall be demonstrated based upon the emission testing procedures specified in 40 CFR Part 60, Appendix A, Method 10.
 - e. Emission Limitation:
1.25 tpy of particulate emissions
Applicable Compliance Method:
This limitation was developed by multiplying the allowable hourly particulate emission limitation (0.286 lb/hr) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
 - f. Emission Limitation:
0.13 tpy of SO₂
Applicable Compliance Method:
This limitation was developed by multiplying the allowable hourly SO₂ emission limitation (0.03 lb/hr) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
 - g. Emission Limitation:
13.95 tpy of NO_x
Applicable Compliance Method:
This limitation was developed by multiplying the allowable hourly NO_x emission limitation (3.185 lbs/hr) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- h. Emission Limitation:
 - 10.21 tpy of CO
 - Applicable Compliance Method:
 - This limitation was developed by multiplying the allowable hourly CO emission limitation (2.33 lbs/hr) by the maximum annual hours of operation (8760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
- 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 within 6 months after issuance of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for NOx.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable NOx mass emission rate: Methods 1 through 4 and Method 7E of 40 CFR Part 60, Appendix A.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity of 31.62 tons per hour, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).
 - Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. 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 CCHD, APCD's refusal to accept the results of the emission test(s).
 - Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576131877 Emissions Unit ID: P043 Issuance type: Title V 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> |
|---|--------------------------------------|--|
|---|--------------------------------------|--|

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

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1576131877 Emissions Unit ID: P044 Issuance type: Title V 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> |
|--|---|---|
| pickling line for stainless steel (up to 102" wide in the 0.080" to 0.554" gauge range) controlled with an acid mist scrubber and a selective catalytic reduction (SCR) NOx reactor unit (NOx measured by CEM to adjust the ammonia flow feed rate; approx. 4 lbs/hr ammonia flow for current influent NOx loading of 350 ppm) | OAC rule 3745-31-05(A)(3) (PTI 15-1166) | 0.74 lb/hr of particulate emissions (including nitric acid and hydrofluoric acid) 0.1 lb/hr of nitric acid fumes 0.438 tpy of nitric acid fumes 0.16 lb/hr of hydrofluoric acid fumes 0.68 tpy of hydrofluoric acid fumes 4.35 lbs/hr of nitrogen oxides (NOx) 19.05 tpy of NOx The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). |

OAC rule 3745-17-11
OAC rule 3745-17-07(A)

See sections A.I.2.b and A.II.5.
See section A.I.2.a.

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

2. Additional Terms and Conditions

- a. The particulate emission limitation required by OAC rule 3745-17-11 is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05.
- b. All of the emissions from this emissions unit shall be captured and vented to an acid mist scrubber and a selective catalytic reduction (SCR) NOx reactor unit.
 - i. The acid mist scrubber shall have a control efficiency of 92% or better.
 - ii. The selective catalytic reduction NOx reactor unit shall have a control efficiency of 70% or better.

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II. Operational Restrictions

1. The pressure drop across the acid mist scrubber shall be maintained within the range of 1.0 to 5.0 inches of water 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 120 gallons per minute at all times while the emissions unit is in operation.
3. The supply pressure in the ammonia feed line to the SCR unit shall be continuously maintained at a value of not less than 80.0 inches of water at all times while the emissions unit is in operation.
4. The SCR reactor unit temperature shall be continuously maintained at a value of not less than 608 degrees F (320 degrees C) at all times while the emissions unit is in operation.
5. Except as necessary to achieve maximum production during a compliance test, the permittee shall not operate emissions unit P044 at a process rate greater than 23.75 tons of steel per hour (or otherwise acceptable product pickling rate) unless the permittee first demonstrates compliance during emissions testing with the limits specified in section A.I.1 of these terms and conditions at the desired, higher operating rate.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
2. This facility shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber 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 the emissions unit is in operation, on an hourly basis:

 - a. the pressure drop across the scrubber, in inches of water;
 - b. the scrubber water flow rate, in gallons per minute; and
 - c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit is in operation.
3. This facility shall properly operate and maintain equipment to continuously monitor the static supply pressure in the ammonia feed line and the SCR reactor unit temperature 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 perform and maintain records of CEM daily calibration drift tests, zero and span check, and the quarterly relative accuracy tests.

The permittee shall collect and record the following information each day the emissions unit is in operation, on an hourly basis:

 - a. the supply pressure in the ammonia feed line, in inches of water;
 - b. the SCR reactor unit post-catalyst temperature, in degrees F; and

- c. a log of the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit is in operation.

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IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director, Canton City Health Department, Air Pollution Control Division by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. the static pressure drop across the scrubber; and
 - b. the scrubber water flow rate.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following SCR unit parameters were not maintained at or above the required levels:
 - a. the static supply pressure in the ammonia feed line; and
 - b. the SCR reactor unit post-catalyst temperature.
4. Deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.I.c.
5. All reports shall be submitted to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue North, Canton, Ohio 44702, (330) 489-3385.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
20% opacity as a 6-minute average
Applicable Compliance Method:
Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2.
 - b. Emission Limitation:
0.74 lb/hr of particulate emissions (including nitric acid and hydrofluoric acid)
Applicable Compliance Method:
Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2.
 - c. Emission Limitation:
0.1 lb/hr of nitric acid fumes and at least 92% control efficiency
Applicable Compliance Method:
Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2.
 - d. Emission Limitation:
0.16 lb/hr of hydrofluoric acid fumes and at least 92% control efficiency
Applicable Compliance Method:
Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2.
 - e. Emission Limitation:

- 4.35 lbs/hr of NOx and at least 70% control efficiency
- Applicable Compliance Method:
- Compliance shall be demonstrated based upon the emission testing procedures specified in section A.V.2.
- f. Emission Limitation:
- 0.438 tpy of nitric acid fumes
- Applicable Compliance Method:
- This emission limitation was developed by multiplying the allowable hourly emission limitation (0.1 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.
- g. Emission Limitation:
- 0.68 tpy of hydrofluoric acid fumes
- Applicable Compliance Method:
- This emission limitation was developed by multiplying the allowable hourly emission limitation (0.16 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.
- h. Emission Limitation:
- 19.05 tpy of NOx
- Applicable Compliance Method:
- This emission limitation was developed by multiplying the allowable hourly emission limitation (4.35 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.
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 within 6 months after issuance of the permit. Any subsequent testing is contingent upon the results of this initial testing.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates, opacity, nitric acid fumes, hydrofluoric acid fumes, and NOx, the control efficiency limitations for nitric acid and hydrofluoric acid fumes from the acid mist scrubber, and the control efficiency limitation for NOx from the SCR reactor unit.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates and control efficiencies:
- particulates - Methods 1 through 5 of 40 CFR Part 60, Appendix A;
nitric acid fumes - Method 26A of 40 CFR Part 60, Appendix A;
hydrofluoric acid fumes - Method 26A of 40 CFR Part 60, Appendix A;
NOx - Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A; and
opacity - Method 9 of 40 CFR Part 60, Appendix A.
- The test methods which must be employed to demonstrate compliance with the control efficiency limitations for nitric acid fumes and hydrofluoric acid fumes are specified below.
- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity of 31.2 tons per hour (or otherwise acceptable product pickling rate) and under process conditions producing maximum NOx, including pickle tank temperature between 130 and 135 degrees Fahrenheit, unless otherwise specified or approved by the Canton City Health Department, Air Pollution Control Division (CCHD, APCD).
- e. 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 and procedures specified in OAC 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the CCHD, APCD. 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 CCHD, APCD's refusal to accept the results of the emission test(s).
- Personnel from the CCHD, APCD 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 CCHD, APCD 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 CCHD, APCD.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576131877 Emissions Unit ID: P044 Issuance type: Title V 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> |
|---|---|--------------------------------------|--|
| 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

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Facility ID: 1576131877 Issuance type: Title V Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1576131877 Emissions Unit ID: T019 Issuance type: Title V 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> |
|---|---|--|
| 12,000-gallon hydrofluoric acid (conc. 70 %) storage tank vented to an acid fume scrubbing system | OAC rule 3745-31-05(A)(3) (PTI 15-1166) | 0.05 lb/hr of hydrofluoric acid fumes |
| | OAC Chapter 3745-104 | 0.227 tpy of hydrofluoric acid fumes |
| | | See section A.I.2.a below. |

2. Additional Terms and Conditions

- a. A Risk Management Plan (RMP) is required for this emissions unit.

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II. Operational Restrictions

1. The hydrofluoric acid fumes from this acid tank shall be vented to the acid fume scrubbing system controlling emissions unit P044.

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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. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
 - 0.05 lb/hr of hydrofluoric acid fumes
 Applicable Compliance Method:
 - If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 13B.

b. Emission Limitation:

0.227 tpy of hydrofluoric acid fumes

Applicable Compliance Method:

This emission limitation was developed by multiplying the allowable hourly emission limitation (0.05 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitations.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1576131877 Emissions Unit ID: T019 Issuance type: Title V 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> |
|---|--------------------------------------|--|
| 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