



State of Ohio Environmental Protection Agency

Street Address:

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Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/15/03

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

04-48-02-0014
Marsulex, Inc.
Duane S Abbott
1400 Otter Creek Road
Oregon, OH 43616-1232

Dear Duane S Abbott:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Toledo Div of Environmental Services within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Toledo Div of Environmental Services.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA (electronically submitted)
File, DAPC PMU
Toledo Div of Environmental Services
Indiana
Michigan



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 05/15/03	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 04-48-02-0014 to:
 Marsulex, Inc., Oregon Refinery Services.
 1400 Otter Creek Road
 Oregon, OH 43616-1232

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

P001 (A-Plant) Sulfuric Acid Regeneration	Z020 (A-Plant preheater) Fuel Fired Heater	Z021 (B-Plant preheater) Fuel Fired Heater
P002 (B-Plant) Sulfuric Acid Regeneration		

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Toledo Div of Environmental Services
 348 South Erie Street
 Toledo, OH 43602-1633
 (419) 936-3015

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **Monitoring and Related Record Keeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c. The permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**
 - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the

requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

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

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record

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

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

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

2. 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 unit(s) 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 OAC rule 3745-15-06, 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).

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

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

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

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition

depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

8. Marketable Permit Programs

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

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

9. Reasonably Anticipated Operating Scenarios

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

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

10. Reopening for Cause

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

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

12. Compliance Requirements

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

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

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

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

13. Permit Shield

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

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

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

14. Operational Flexibility

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

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

15. Emergencies

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

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

16. Off-Permit Changes

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

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

- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

17. Compliance Method Requirements

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

(This term is provided for informational purposes only.)

18. Insignificant Activities

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

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

19. Permit to Install Requirement

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

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

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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.)

2. 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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. This facility developed and registered a risk management plan pursuant to section 112(r) of the Act and is required to comply with the requirements of section 112(r) and the regulations adopted thereunder.

B. State Only Enforceable Section

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

T001 - tank 200 (PTI 04-819 issued May 5, 1993);
T002 - tank 196 (PTI 04-1022 issued May 15, 1996);
T003 - tank 198 (PTI 04-1022 issued May 15, 1996);
T004 - tank 202 (PTI 04-01164 issued March 15, 2000);
T005 - tank 204 (PTI 04-01164 issued March 15, 2000);
Z022 - gasoline storage tank;
Z029 - tank 217;
Z030 - tank 206;
Z031 - tank 208;
Z032 - tank 209;
Z033 - tank 211;
Z035 - tank 213;
Z037 - tank 215;
Z038 - tank 216;
Z039 - tank 666;
Z040 - sulfur tank;
Z041 - sulfur pit;
Z042 - tank 220;
Z043 - tank 250;
Z044 - building heaters; and
Z045 - cooling towers.

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: A-Plant (P001)

Activity Description: Sulfuric Acid Regeneration

A. State and Federally Enforceable Section

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 Regeneration: A-plant	OAC rule 3745-31-05(A)(3) (PTI 04-923 as modified November 20, 2001)	102.7 lbs/hr of sulfur dioxide (SO ₂) 2,465 lbs/day of SO ₂ 450 tons of SO ₂ per rolling, 365-day period 3.60 lbs/hr of sulfuric acid mist 15.8 tpy of sulfuric acid mist 0.82 lb/hr of carbon monoxide (CO) 3.59 tpy of CO 3.85 lbs/hr of nitrogen oxides (NO _x) 16.5 tpy of NO _x
	OAC rule 3745-18-54(X)	See sections A.I.2.a and A.I.2.d. 6.50 pounds of SO ₂ per ton of 100% acid produced
	OAC rule 3745-23-06(B)	See section A.I.2.b. See section A.I.2.c.

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-54(X) and 3745-23-06(B).
- 2.b This emission limitation does not apply during periods of start-up and shutdown, provided that during start-up or shutdown, the permittee shall to the extent practicable, maintain and operate the emissions unit in a manner consistent with good air pollution control practices for minimizing emissions. The permittee shall comply with the applicable hourly mass SO₂ limit during periods of start-up or shutdown. During periods of start-up or shutdown, the pounds of SO₂ per ton of 100% sulfuric acid produced limit does not apply because sulfuric acid is not produced at 100% capacity.
- 2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 04-923.

2. Additional Terms and Conditions (continued)

- 2.d** The hourly and annual emission limits for CO and NO_x are based on the potential to emit for this emissions unit at maximum capacity for 8,760 hours per year, therefore monitoring, record keeping and reporting are not necessary to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and operate the modified continuous bubbler system (CBS) to record and report SO₂ emissions data from this emissions unit in accordance with the May 5, 1987 approved State Implementation Plan revision. The modified CBS shall comply with the requirements specified in 40 CFR Part 51, Appendix P. The modified CBS shall record SO₂ emissions in pounds per hour, pounds per day, tons per year, and pounds of SO₂ per ton of 100% of sulfuric acid produced. The pounds per hour emission measurements shall be based on three-hour block averages. There are eight block averages per day. These records shall be maintained at the facility and be available upon request for inspection for a period of five years.
2. A flow monitor shall be maintained and operated for this emissions unit to allow for monitoring SO₂ emissions in units of pounds per hour, pounds per day, and tons per year. This continuous flow monitoring equipment shall comply with the requirements specified in 40 CFR, Part 60.
3. The permittee shall continue to implement a quality assurance/quality control program. All maintenance on any portion of the continuous emissions monitoring system shall be documented in a logbook dedicated to the monitoring system.

IV. Reporting Requirements

1. For the purposes of reporting excess emissions, the permittee shall report all daily exceedances of the pounds per day emission limitation based on an arithmetic average of the eight (8) three (3)-hour "block" averages for each calendar day. The permittee shall report all exceedances of the 6.5 pounds of SO₂ emitted per ton of one-hundred percent sulfuric acid produced. Also, the permittee shall report all exceedances of the 102.7 pounds of SO₂ per hour, 2465 pounds of SO₂ per day, and 450 tons of SO₂ per rolling, 365-day period limitations.
2. Excess Emission Reports shall be submitted to the Toledo Division of Environmental Services (TDOES) on a quarterly basis. The reports shall be submitted by January 31, April 30, July 31 and October 30 of each year and shall cover the data obtained during the previous calendar quarters.

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:

1.a Emission Limitation:

102.7 lbs/hr of SO₂

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III. Performance testing on February 5, 1998 using Methods 1 through 4 and 8 of 40 CFR Part 60, Appendix A resulted in an emissions rate of 95.7 lbs/hr of SO₂. If required, compliance shall be demonstrated by Methods 1 through 4 and Method 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

V. Testing Requirements (continued)

1.b Emission Limitation:

2,465 lbs/day of SO₂

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.

1.c Emission Limitation:

450 tons of SO₂ per rolling, 365-day period

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.

1.d Emission Limitation:

3.60 lbs/hr of sulfuric acid mist

Applicable Compliance Method:

Performance testing on February 5, 1998 using Methods 1 through 4 and Method 8 of 40 CFR Part 60, Appendix A resulted in emissions of 2.58 lbs/hr of sulfuric acid mist. If required, compliance shall be demonstrated by Methods 1 through 4 and Method 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.e Emission Limitation:

15.8 tpy of sulfuric acid mist

Applicable Compliance Method:

The annual sulfuric acid mist emission limitation was developed by multiplying the hourly allowable emission limitation of 3.60 lbs/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

1.f Emission Limitation:

6.50 pounds of SO₂ per ton of 100% acid produced

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements of section A.III. If required, compliance shall be demonstrated by Methods 1 through 4 and Method 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.g Emission Limitation:

0.82 lb/hr of CO

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor of 84 pounds of CO per million cubic feet of natural gas burned (Table 1.4-1, dated 7/98) by the maximum natural gas usage rate of 10 million Btu/hr, and then dividing by the gas heating value of 1,020 Btu/scf. If required, compliance shall be demonstrated by Methods 1 through 4 and Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

V. Testing Requirements (continued)

1.h Emission Limitation:

3.59 tpy of CO

Applicable Compliance Method:

The annual CO emission limitation was developed by multiplying the hourly allowable emission limitation of 0.82 lb/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

1.i Emission Limitation:

3.85 lbs/hr of NOx

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the Marsulex, Inc. developed NOx emission factor of 30 ppm by the exhaust volume in standard cubic feet per hour, and by 30 lbs of NOx per mole, and then dividing by 379 standard cubic feet per mole, and dividing by one million. If required, compliance shall be demonstrated by Methods 1 through 4 and Method 7 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.j Emission Limitation:

16.5 tpy of NOx

Applicable Compliance Method:

The annual NOx emission limitation was developed by multiplying the hourly allowable emission limitation of 3.85 lbs/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission 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 approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for SO₂ and sulfuric acid mist.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for SO₂ and sulfuric acid mist, Methods 1 through 4 and Method 8. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

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 TDOES.

V. Testing Requirements (continued)

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

Personnel from the TDOES 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 TDOES 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 TDOES.

3. Relative Accuracy Test Audit (RATA)

The permittee shall perform a relative accuracy test audit on the continuous sulfur dioxide monitoring system in accordance with the following requirements:

- a. The RATA shall be conducted once every four calendar quarters.
- b. The following test method shall be used: the modified continuous bubbler method as approved by Ohio EPA on October 9, 1986 for the modified CBS and Performance Specification 6 of 40 CFR Part 60, Appendix B for the flow monitor.
- c. The flow RATA shall be conducted while the emissions unit is operating at more than 50% of normal load.

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

Personnel from the TDOES 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 TDOES 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 TDOES.

VI. Miscellaneous Requirements

1. The permittee must apply for and obtain a permit to install from the Ohio EPA before increasing production above levels listed in the permit to install application for PTI 04-00923 or before making any further modifications to this emissions unit.

B. State Enforceable Section

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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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: B-Plant (P002)

Activity Description: Sulfuric Acid Regeneration

A. State and Federally Enforceable Section

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 Regeneration: B-plant	OAC rule 3745-31-05(A)(3) (PTI 04-923 as modified November 20, 2001)	59.5 lbs/hr of sulfur dioxide (SO ₂) 1,428 lbs/day of SO ₂ 261 tons of SO ₂ per rolling, 365-day period 2.10 lbs/hr of sulfuric acid mist 9.20 tpy of sulfuric acid mist 0.82 lb/hr of carbon monoxide (CO) 3.59 tpy of CO 2.42 lbs/hr of nitrogen oxides (NO _x) 10.6 tpy of NO _x
	OAC rule 3745-18-54(X)	See sections A.I.2.a and A.I.2.d. 6.50 pounds of SO ₂ per ton of 100% acid produced
	OAC rule 3745-23-06(B)	See section A.I.2.b. See section A.I.2.c.

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-18-54(X) and 3745-23-06(B).
- 2.b This emission limitation does not apply during periods of start-up and shutdown, provided that during start-up or shutdown, the permittee shall to the extent practicable, maintain and operate the emissions unit in a manner consistent with good air pollution control practices for minimizing emissions. The permittee shall comply with the applicable hourly mass SO₂ limit during periods of start-up or shutdown. During periods of start-up or shutdown, the pounds of SO₂ per ton of 100% sulfuric acid produced limit does not apply because sulfuric acid is not produced at 100% capacity.
- 2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 04-923.

2. Additional Terms and Conditions (continued)

- 2.d** The hourly and annual emission limits for CO and NOx are based on the potential to emit for this emissions unit at maximum capacity for 8,760 hours per year, therefore monitoring, record keeping and reporting are not necessary to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain and operate the modified continuous bubbler system (CBS) to record and report SO₂ emissions data from this emissions unit in accordance with the May 5, 1987 approved State Implementation Plan revision. The modified CBS shall comply with the requirements specified in 40 CFR Part 51, Appendix P. The modified CBS shall record SO₂ emissions in pounds per hour, pounds per day, tons per year, and pounds of SO₂ per ton of 100% of sulfuric acid produced. The pounds per hour emission measurements shall be based on three-hour block averages. There are eight block averages per day. These records shall be maintained at the facility and be available upon request for inspection for a period of five years.
2. A flow monitor shall be maintained and operated for this emissions unit to allow for monitoring SO₂ emissions in units of pounds per hour, pounds per day, and tons per year. This continuous flow monitoring equipment shall comply with the requirements specified in 40 CFR, Part 60.
3. The permittee shall continue to implement a quality assurance/quality control program. All maintenance on any portion of the continuous emissions monitoring system shall be documented in a logbook dedicated to the monitoring system.

IV. Reporting Requirements

1. For the purposes of reporting excess emissions, the permittee shall report all daily exceedances of the pounds per day emission limitation based on an arithmetic average of the eight (8) three (3)-hour "block" averages for each calendar day. The permittee shall report all exceedances of the 6.5 pounds of SO₂ emitted per ton of one-hundred percent sulfuric acid produced. Also, the permittee shall report all exceedances of the 59.5 pounds of SO₂ per hour, 1428 pounds of SO₂ per day, and 261 tons of SO₂ per rolling, 365-day period limitations.
2. Excess Emission Reports shall be submitted to the Toledo Division of Environmental Services (TDOES) on a quarterly basis. The reports shall be submitted by January 31, April 30, July 31 and October 30 of each year and shall cover the data obtained during the previous calendar quarters.

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:

1.a Emission Limitation:

59.5 lbs/hr of SO₂

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III. Performance testing on May 24, 2001 using Methods 1 through 4 and 8 of 40 CFR Part 60, Appendix A resulted in an emissions rate of 37.91 lbs/hr of SO₂. If required, compliance shall be demonstrated by Methods 1 through 4 and Method 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

V. Testing Requirements (continued)

1.b Emission Limitation:

1,428 lbs/day of SO₂

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.

1.c Emission Limitation:

261 tons of SO₂ per rolling, 365-day period

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section A.III.

1.d Emission Limitation:

2.10 lbs/hr of sulfuric acid mist

Applicable Compliance Method:

Performance testing on February 5, 1998 using Methods 1 through 4 and Method 8 of 40 CFR Part 60, Appendix A resulted in emissions of 1.96 lbs/hr of sulfuric acid mist. If required, compliance shall be demonstrated by Methods 1 through 4 and Method 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.e Emission Limitation:

9.20 tpy of sulfuric acid mist

Applicable Compliance Method:

The annual sulfuric acid mist emission limitation was developed by multiplying the hourly allowable emission limitation of 2.10 lbs/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

1.f Emission Limitation:

6.50 pounds of SO₂ per ton of 100% acid produced

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements of section A.III. If required, compliance shall be demonstrated by Methods 1 through 4 and Method 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.g Emission Limitation:

0.82 lb/hr of CO

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor of 84 pounds of CO per million cubic feet of natural gas burned (Table 1.4-1, dated 7/98) by the maximum natural gas usage rate of 10 million Btu/hr, and then dividing by the gas heating value of 1,020 Btu/scf. If required, compliance shall be demonstrated by Methods 1 through 4 and Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

V. Testing Requirements (continued)

1.h Emission Limitation:

3.59 tpy of CO

Applicable Compliance Method:

The annual CO emission limitation was developed by multiplying the hourly allowable emission limitation of 0.82 lb/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

1.i Emission Limitation:

2.42 lbs/hr of NOx

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the Marsulex, Inc. developed NOx emission factor of 30 ppm by the exhaust volume in standard cubic feet per hour, and by 30 lbs of NOx per mole, and then dividing by 379 standard cubic feet per mole, and dividing by one million. If required, compliance shall be demonstrated by Methods 1 through 4 and Method 7 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.j Emission Limitation:

10.6 tpy of NOx

Applicable Compliance Method:

The annual NOx emission limitation was developed by multiplying the hourly allowable emission limitation of 2.42 lbs/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission 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 approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rates for SO₂ and sulfuric acid mist.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for SO₂ and sulfuric acid mist, Methods 1 through 4 and Method 8. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

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 TDOES.

V. Testing Requirements (continued)

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

Personnel from the TDOES 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 TDOES 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 TDOES.

3. Relative Accuracy Test Audit (RATA)

The permittee shall perform a relative accuracy test audit on the continuous sulfur dioxide monitoring system in accordance with the following requirements:

- a. The RATA shall be conducted once every four calendar quarters.
- b. The following test method shall be used: the modified continuous bubbler method as approved by Ohio EPA on October 9, 1986 for the modified CBS and Performance Specification 6 of 40 CFR Part 60, Appendix B for the flow monitor.
- c. The flow RATA shall be conducted while the emissions unit is operating at more than 50% of normal load.

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

Personnel from the TDOES 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 TDOES 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 TDOES.

VI. Miscellaneous Requirements

1. The permittee must apply for and obtain a permit to install from the Ohio EPA before increasing production above levels listed in the permit to install application for PTI 04-00923 or before making any further modifications to this emissions unit.

B. State Enforceable Section

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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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: A-Plant preheater (Z020)
Activity Description: Fuel Fired Heater

A. State and Federally Enforceable Section

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>
A-Plant pre-heater/ 19 million Btu/hr natural gas-fired heater	OAC rule 3745-31-05(A)(3) (PTI 04-1166 as issued June 3, 1999)	1.6 lbs/hr of carbon monoxide (CO) 7.0 tpy of CO
		0.95 lb/hr of nitrogen oxides (NOx) 4.2 tpy of NOx
		0.04 lb/hr of particulate emissions 0.16 tpy of particulate emissions
		0.01 lb/hr of sulfur dioxide (SO2) 0.05 tpy of SO2
		0.10 lb/hr of volatile organic compounds (VOC) 0.46 tpy of VOC
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-23-06(B).
		See section A.1.2.a.
	OAC rule 3745-17-10(B)	Visible particulate emissions, from any stack, shall not exceed 20% opacity as a 6-minute average, except as provided in the rule.
	OAC rule 3745-17-07(A)	See section A.1.2.b.
	OAC rule 3745-23-06(B)	

2. Additional Terms and Conditions

- 2.a The particulate emission limitation established by this applicable rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 04-923.

II. Operational Restrictions

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

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.

IV. Reporting Requirements

1. The permittee shall submit semi-annual 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 by January 30 and July 30 of each year and shall cover the previous 6 calendar months of operation.

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:

1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance based upon performance testing in accordance with the methods and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

1.b Emission Limitation:

1.6 lbs/hr of CO

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor from Table 1.4-1 (dated 7/98) of 84 pounds of CO per million cubic feet of natural gas burned by the maximum capacity of 19.0 million Btu/hr, and then dividing by the gas heating value of 1,020 Btu/scf. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Methods 1 through 4 and Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.c Emission Limitation:

7.0 tpy of CO

Applicable Compliance Method:

The annual CO emission limitation was developed by multiplying the hourly allowable emission limitation of 1.6 lbs/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

V. Testing Requirements (continued)

1.d Emission Limitation:

0.95 lb/hr of NO_x

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor from Table 1.4-1 (dated 2/98) of 50 pounds of NO_x per million cubic feet of natural gas burned by the maximum capacity of 19.0 million Btu/hr, and then dividing by the heat content of 1020 Btu/scf. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Methods 1 through 4 and Method 7 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.e Emission Limitation:

4.2 tpy of NO_x

Applicable Compliance Method:

The annual NO_x emission limitation was developed by multiplying the hourly allowable emission limitation of 0.95 lb/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

1.f Emission Limitation:

0.04 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor from Table 1.4-2 (dated 7/98) of 1.9 pounds of particulate emissions per million cubic feet of natural gas burned by the maximum capacity of 19.0 million Btu/hr, and then dividing by the gas heating value of 1,020 Btu/scf. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.g Emission Limitation:

0.16 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor (dated 2/98) of 1.9 pounds of particulate emissions per million cubic feet of natural gas burned by the maximum capacity of 19.0 million Btu/hr, and by a maximum operating schedule of 8760 hours per year, and then dividing by the heat content of 1020 Btu/scf, and dividing by 2000 lbs/ton.

1.h Emission Limitation:

0.01 lb/hr of SO₂

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor from Table 1.4-2 (dated 7/98) of 0.6 pound of SO₂ per million cubic feet of natural gas burned by the maximum capacity of 19.0 million Btu/hr, and then dividing by the gas heating value of 1,020 Btu/scf. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Methods 1 through 4 and Method 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

V. Testing Requirements (continued)

1.i Emission Limitation:

0.05 tpy of SO₂

Applicable Compliance Method:

The annual SO₂ emission limitation was developed by multiplying the hourly allowable emission limitation of 0.01 lb/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

1.j Emission Limitation:

0.10 lb/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor from Table 1.4-2 (dated 7/98) of 5.5 pounds of VOC per million cubic feet of natural gas burned by the maximum capacity of 19.0 million Btu/hr, and then dividing by the gas heating value of 1,020 Btu/scf. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Methods 1 through 4 and Method 25 of 40 CFR Part 60. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.k Emission Limitation:

0.46 tpy of VOC

Applicable Compliance Method:

The annual VOC emission limitation was developed by multiplying the hourly allowable emission limitation of 0.10 lb/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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>
A-Plant pre-heater/ 19 million Btu/hr natural gas-fired heater		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. If no deviations from the operational restriction under Part III section A.II occurred during a calendar quarter, then the permittee shall submit a quarterly report according to Part I section B.1.b which states that no deviations occurred during the calendar quarter.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: B-Plant preheater (Z021)
Activity Description: Fuel Fired Heater

A. State and Federally Enforceable Section

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>
B-Plant pre-heater/ 16.5 million Btu/hr natural gas-fired heater	OAC rule 3745-31-05(A)(3) (PTI 04-1166 as issued June 3, 1999)	1.4 lbs/hr of carbon monoxide (CO) 6.1 tpy of CO 0.83 lb/hr of nitrogen oxides (NOx) 3.6 tpy of NOx 0.03 lb/hr of particulate emissions 0.14 tpy of particulate emissions 0.01 lb/hr of sulfur dioxide (SO2) 0.04 tpy of SO2 0.09 lb/hr of volatile organic compounds (VOC) 0.40 tpy of VOC The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-23-06(B).
	OAC rule 3745-17-10(B)	See section A.1.2.a.
	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 in the rule.
	OAC rule 3745-23-06(B)	See section A.1.2.b.

2. Additional Terms and Conditions

- 2.a The particulate emission limitation established by this applicable rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 04-923.

II. Operational Restrictions

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

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.

IV. Reporting Requirements

1. The permittee shall submit semi-annual 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 by January 30 and July 30 of each year and shall cover the previous 6 calendar months of operation.

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:

1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance based upon performance testing in accordance with the methods and procedures specified in Method 9 of 40 CFR Part 60, Appendix A.

1.b Emission Limitation:

1.4 lbs/hr of CO

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor from Table 1.4-1 (dated 7/98) of 84 pounds of CO per million cubic feet of natural gas burned by the maximum capacity of 16.5 million Btu/hr, and then dividing by the gas heating value of 1,020 Btu/scf. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Methods 1 through 4 and Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.c Emission Limitation:

6.1 tpy of CO

Applicable Compliance Method:

The annual CO emission limitation was developed by multiplying the hourly allowable emission limitation of 1.4 lbs/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

V. Testing Requirements (continued)

1.d Emission Limitation:

0.83 lb/hr of NO_x

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor from Table 1.4-1 (dated 2/98) of 50 pounds of NO_x per million cubic feet of natural gas burned by the maximum capacity of 16.5 million Btu/hr, and then dividing by the heat content of 1020 Btu/scf. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Methods 1 through 4 and Method 7 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.e Emission Limitation:

3.6 tpy of NO_x

Applicable Compliance Method:

The annual NO_x emission limitation was developed by multiplying the hourly allowable emission limitation of 0.83 lb/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

1.f Emission Limitation:

0.03 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor from Table 1.4-2 (dated 7/98) of 1.9 pounds of particulate emissions per million cubic feet of natural gas burned by the maximum capacity of 16.5 million Btu/hr, and then dividing by the gas heating value of 1,020 Btu/scf. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.g Emission Limitation:

0.14 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor (dated 2/98) of 1.9 pounds of particulate emissions per million cubic feet of natural gas burned by the maximum capacity of 16.5 million Btu/hr, and by a maximum operating schedule of 8760 hours per year, and then dividing by the heat content of 1020 Btu/scf, and dividing by 2000 lbs/ton.

1.h Emission Limitation:

0.01 lb/hr of SO₂

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor from Table 1.4-2 (dated 7/98) of 0.6 pound of SO₂ per million cubic feet of natural gas burned by the maximum capacity of 16.5 million Btu/hr, and then dividing by the gas heating value of 1,020 Btu/scf. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Methods 1 through 4 and Method 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

V. Testing Requirements (continued)

1.i Emission Limitation:

0.04 tpy of SO₂

Applicable Compliance Method:

The annual SO₂ emission limitation was developed by multiplying the hourly allowable emission limitation of 0.01 lb/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

1.j Emission Limitation:

0.09 lb/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the AP-42 emission factor from Table 1.4-2 (dated 7/98) of 5.5 pounds of VOC per million cubic feet of natural gas burned by the maximum capacity of 16.5 million Btu/hr, and then dividing by the gas heating value of 1,020 Btu/scf. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Methods 1 through 4 and Method 25 of 40 CFR Part 60. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

1.k Emission Limitation:

0.4 tpy of VOC

Applicable Compliance Method:

The annual VOC emission limitation was developed by multiplying the hourly allowable emission limitation of 0.09 lb/hr by a maximum operating schedule of 8760 hours/year, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual emission limitation.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

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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B-Plant pre-heater/ 16.5 million
Btu/hr natural gas-fired heater

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

1. If no deviations from the operational restriction under Part III section A.II occurred during a calendar quarter, then the permittee shall submit a quarterly report according to Part I section B.1.b which states that no deviations occurred during the calendar quarter.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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