

State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

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

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY
Application No: 13-2953**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
X	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: August 25, 1999

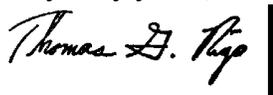
ChemCentral
Robert Garner
7050 West 71st Street PO Box 730
Bedford Park, IL 60499

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$ 9600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,



Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

Permit To Install

Issue Date: To be entered upon final issuance

Terms and Conditions

Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 13-2953

Application Number: 13-2953

APS Premise Number: 1318557875

Permit Fee: **To be entered upon final issuance**

Name of Facility: ChemCentral

Person to Contact: Robert Garner

Address: 7050 West 71st Street PO Box 730
Bedford Park, IL 60499

Location of proposed air contaminant source(s) [emissions unit(s)]:

**21600 Drake Road
Strongsville, Ohio**

Description of proposed emissions unit(s):

THREE DRUM FILLING STATIONS AND THREE TANK TRUCK LOADING RACKS.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the

Date: To be entered upon final issuance

Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

sources are inadequate or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC/VOC	49.8

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Submerged filling organic compound tank truck loading rack. Transport Loading Station #1.	OAC rule 3745-31-05 (A)(3)	OC (organic compounds) and VOC (volatile organic compounds) emissions shall not exceed 234 pounds per day and 9.31 tons per year. Submerged filling or bottom filling system.
	OAC rule 3745-35-07 (B)	9.31 tons per rolling 12-month period.
	OAC rule 3745-21-07 (E)	See rule, equivalent to BAT.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) determination for this emissions unit is the use of submerged filling or bottom filling system for all tank trucks. The tank truck loading rack shall be equipped with submerged filling or bottom filling system.
- 2.b In accordance with OAC rule 3745-21-07 (E), the maximum daily throughput of all volatile photochemically reactive materials, as defined in OAC rule 3745-21-01 (C), shall not exceed 40,000 gallons per day.

B. Operational Restrictions

1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
2. The emissions of OC/VOC from this emissions unit shall not exceed 9.31 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The following equations, based upon throughput, shall be used to calculate monthly emissions:

AP-42, Section 5.2 (1/95), "Loading loss equation"

$$E = (12.46 * S * P * M) / T$$

Where

E = OC/VOC emission factor, pounds OC/VOC per 1000 gallons

S= Saturation factor (1.45 for splash filling; 0.6 for submerged filling dedicated normal service tank, and 0.5 for submerged filling clean tank, Table 5.2-1)

P= Vapor pressure of material loaded at T, in pounds per square inch absolute

M= Molecular weight of material loaded

T= Temperature of material loaded, degrees Rankine, R ® = 460 + degrees Fahrenheit)

i = Index number

n = Total number of materials, days, months, or emission factors

n

$$\text{OC/VOC emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per day}), \text{ pounds OC/VOC per day}$$

$$\text{OC/VOC emissions} = \sum (\text{pounds OC/VOC per first day} + \dots + \text{pounds OC/VOC per last day of the month}) * \text{ton}/2000 \text{ pounds} = \text{total pounds OC/VOC per month} * \text{ton}/2000 \text{ pounds} = \text{total tons OC/VOC per month}$$

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of OC/VOC (Tons) (based on throughput)</u>
1	0.77
1-2	1.55
1-3	2.32
1-4	3.10
1-5	3.87
1-6	4.65
1-7	5.43
1-8	6.20
1-9	6.98
1-10	7.75
1-11	8.53
1-12	9.31

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for OC/VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the volume throughput when this emissions unit is operation:
 - a. the name and identification of each OC/VOC product;
 - b. the volume throughput of each OC/VOC product in gallons;
 - c. the density of each OC/VOC product, in pounds per gallon;
 - d. the molecular weight of each OC/VOC product;
 - e. the vapor pressure of each OC/VOC product in pounds per square inch absolute;
 - f. the total OC/VOC emission rate for all products, in pounds per day;
 - g. the total OC/VOC emission rate for all products, in pounds per month;
 - h. the total OC/VOC emission rate for all products, in tons per month; and,
 - i. the total OC/VOC emission rate for all products, in tons per rolling 12-months (and during the first year, the cumulative total tons of OC/VOC each month).
2. These records, as well as any supporting emission analyses and computations, shall be retained in the company's files (on site) for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC/VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall submit quarterly written deviation (excursion) reports of any daily, monthly, and/or yearly records showing that the calculated OC/VOC emissions, exceeded the applicable OC/VOC emission limitations. If no such instances have occurred during a particular quarter, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If reports or documented material(s) contain confidential information, submit a sanitized version along with the required reports.

E. Testing Requirements

1. Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission limitation:

234 pounds OC/VOC per day

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C., Monitoring and/or Recordkeeping Requirements and the following equation:

AP-42, Section 5.2 (1/95), "Loading loss equation"

$$E = (12.46 * S * P * M) / T$$

Where

E = OC/VOC emission factor, pounds OC/VOC per 1000 gallons

S = Saturation factor (1.45 for splash filling; 0.6 for submerged filling dedicated normal service tank, and 0.5 for submerged filling clean tank, Table 5.2-1)

P = Vapor pressure of material loaded at T, in pounds per square inch absolute

M = Molecular weight of material loaded

T = Temperature of material loaded, degrees Rankine, R [®] = 460 + degrees Fahrenheit)

i = Index number

n = Total number of materials, days, months, or emission factors

$$\text{OC/VOC emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per day}), \text{ pounds OC/VOC per day}$$

b. Emission limitation:

9.31 tons OC/VOC per rolling 12 month period

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C., Monitoring and/or Recordkeeping Requirements and the following equation:

$$\text{OC/VOC emissions} = \sum (\text{pounds OC/VOC per first day} + \dots + \text{pounds OC/VOC per last day of the month}) * \text{ton}/2000 \text{ pounds} = \text{total pounds OC/VOC per month} * \text{ton}/2000 \text{ pounds} = \text{total tons OC/VOC per month}$$

Current month	Previous 11 months	Total 12-month
Tons of OC/VOC	+ tons of OC/VOC	≤ 9.31 tons of OC/VOC

F. Miscellaneous Requirements

None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Submerged filling organic compound tank truck loading rack. Transport Loading Station #2.	OAC rule 3745-31-05 (A)(3)	OC (organic compounds) and VOC (volatile organic compounds) emissions shall not exceed 234 pounds per day and 9.31 tons per year. Submerged filling or bottom filling system.
	OAC rule 3745-35-07 (B)	9.31 tons per rolling 12-month period.
	OAC rule 3745-21-07 (E)	See rule, equivalent to BAT.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) determination for this emissions unit is the use of submerged filling or bottom filling system for all tank trucks. The tank truck loading rack shall be equipped with submerged filling or bottom filling system.
- 2.b In accordance with OAC rule 3745-21-07 (E), the maximum daily throughput of all volatile photochemically reactive materials, as defined in OAC rule 3745-21-01 (C), shall not exceed 40,000 gallons per day.

B. Operational Restrictions

1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
2. The emissions of OC/VOC from this emissions unit shall not exceed 9.31 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The following equations, based upon throughput, shall be used to calculate monthly emissions:

AP-42, Section 5.2 (1/95), "Loading loss equation"

$$E = (12.46 * S * P * M) / T$$

Where

E = OC/VOC emission factor, pounds OC/VOC per 1000 gallons

S = Saturation factor (1.45 for splash filling; 0.6 for submerged filling dedicated normal service tank, and 0.5 for submerged filling clean tank, Table 5.2-1)

- P= Vapor pressure of material loaded at T, in pounds per square inch absolute
- M= Molecular weight of material loaded
- T= Temperature of material loaded, degrees Rankine, R ® = 460 + degrees Fahrenheit)
- i = Index number
- n = Total number of materials, days, months, or emission factors

$$OC/VOC \text{ emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per day}), \text{ pounds OC/VOC per day}$$

$$OC/VOC \text{ emissions} = \sum (\text{pounds OC/VOC per first day} + \dots + \text{pounds OC/VOC per last day of the month}) * \text{ton}/2000 \text{ pounds} = \text{total pounds OC/VOC per month} * \text{ton}/2000 \text{ pounds} = \text{total tons OC/VOC per month}$$

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of OC/VOC (Tons) (based on throughput)</u>
1	0.77
1-2	1.55
1-3	2.32
1-4	3.10
1-5	3.87
1-6	4.65
1-7	5.43
1-8	6.20
1-9	6.98
1-10	7.75
1-11	8.53
1-12	9.31

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for OC/VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the volume throughput when this emissions unit is operation:
 - a. the name and identification of each OC/VOC product;
 - b. the volume throughput of each OC/VOC product in gallons;
 - c. the density of each OC/VOC product, in pounds per gallon;
 - d. the molecular weight of each OC/VOC product;
 - e. the vapor pressure of each OC/VOC product in pounds per square inch absolute;
 - f. the total OC/VOC emission rate for all products, in pounds per day;
 - g. the total OC/VOC emission rate for all products, in pounds per month;
 - h. the total OC/VOC emission rate for all products, in tons per month; and,
 - i. the total OC/VOC emission rate for all products, in tons per rolling 12-months (and during the first year, the cumulative total tons of OC/VOC each month).
2. These records, as well as any supporting emission analyses and computations, shall be retained in the company's files (on site) for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC/VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall submit quarterly written deviation (excursion) reports of any daily, monthly, and/or yearly records showing that the calculated OC/VOC emissions, exceeded the applicable OC/VOC emission limitations. If no such instances have occurred during a particular quarter, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If reports or documented material(s) contain confidential information, submit a sanitized version along with the required reports.

E. Testing Requirements

1. Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission limitation:

234 pounds OC/VOC per day

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C., Monitoring and/or Recordkeeping Requirements and the following equation:

AP-42, Section 5.2 (1/95), "Loading loss equation"

$$E = (12.46 * S * P * M) / T$$

Where

E = OC/VOC emission factor, pounds OC/VOC per 1000 gallons

S = Saturation factor (1.45 for splash filling; 0.6 for submerged filling dedicated normal service tank, and 0.5 for submerged filling clean tank, Table 5.2-1)

P = Vapor pressure of material loaded at T, in pounds per square inch absolute

M = Molecular weight of material loaded

T = Temperature of material loaded, degrees Rankine, $R^{\circ} = 460 + \text{degrees Fahrenheit}$

i = Index number

n = Total number of materials, days, months, or emission factors

$$\text{OC/VOC emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per day}), \text{ pounds OC/VOC per day}$$

b. Emission limitation:

9.31 tons OC/VOC per rolling 12 month period

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C., Monitoring and/or Recordkeeping Requirements and the following equation:

$$\text{OC/VOC emissions} = \sum (\text{pounds OC/VOC per first day} + \dots + \text{pounds OC/VOC per last day of the month}) * \text{ton}/2000 \text{ pounds} = \text{total pounds OC/VOC per month} * \text{ton}/2000 \text{ pounds} = \text{total tons OC/VOC per month}$$

Current month	Previous 11 months	Total 12-month
Tons of OC/VOC	+ tons of OC/VOC	≤ 9.31 tons of OC/VOC

F. Miscellaneous Requirements

None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Submerged filling organic compound tank truck loading rack. Transport Loading Station #3.	OAC rule 3745-31-05 (A)(3)	OC (organic compounds) and VOC (volatile organic compounds) emissions shall not exceed 234 pounds per day and 9.31 tons per year. Submerged filling or bottom filling system.
	OAC rule 3745-35-07 (B)	9.31 tons per rolling 12-month period.
	OAC rule 3745-21-07 (E)	See rule, equivalent to BAT.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) determination for this emissions unit is the use of submerged filling or bottom filling system for all tank trucks. The tank truck loading rack shall be equipped with submerged filling or bottom filling system.
- 2.b In accordance with OAC rule 3745-21-07 (E), the maximum daily throughput of all volatile photochemically reactive materials, as defined in OAC rule 3745-21-01 (C), shall not exceed 40,000 gallons per day.

B. Operational Restrictions

1. A means shall be provided to prevent drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
2. The emissions of OC/VOC from this emissions unit shall not exceed 9.31 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The following equations, based upon throughput, shall be used to calculate monthly emissions:

AP-42, Section 5.2 (1/95), "Loading loss equation"

$$E = (12.46 * S * P * M) / T$$

Where

E = OC/VOC emission factor, pounds OC/VOC per 1000 gallons

- S= Saturation factor (1.45 for splash filling; 0.6 for submerged filling dedicated normal service tank, and 0.5 for submerged filling clean tank, Table 5.2-1)
- P= Vapor pressure of material loaded at T, in pounds per square inch absolute
- M= Molecular weight of material loaded
- T= Temperature of material loaded, degrees Rankine, R ® = 460 + degrees Fahrenheit)
- i = Index number
- n = Total number of materials, days, months, or emission factors

$$OC/VOC \text{ emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per day}), \text{ pounds OC/VOC per day}$$

$$OC/VOC \text{ emissions} = \sum (\text{pounds OC/VOC per first day} + \dots + \text{pounds OC/VOC per last day of the month}) * \text{ton}/2000 \text{ pounds} = \text{total pounds OC/VOC per month} * \text{ton}/2000 \text{ pounds} = \text{total tons OC/VOC per month}$$

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of OC/VOC (Tons) (based on throughput)</u>
1	0.77
1-2	1.55
1-3	2.32
1-4	3.10
1-5	3.87
1-6	4.65
1-7	5.43
1-8	6.20
1-9	6.98
1-10	7.75
1-11	8.53
1-12	9.31

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for OC/VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the volume throughput when this emissions unit is operation:
 - a. the name and identification of each OC/VOC product;

- b. the volume throughput of each OC/VOC product in gallons;
 - c. the density of each OC/VOC product, in pounds per gallon;
 - d. the molecular weight of each OC/VOC product;
 - e. the vapor pressure of each OC/VOC product in pounds per square inch absolute;
 - f. the total OC/VOC emission rate for all products, in pounds per day;
 - g. the total OC/VOC emission rate for all products, in pounds per month;
 - h. the total OC/VOC emission rate for all products, in tons per month; and,
 - i. the total OC/VOC emission rate for all products, in tons per rolling 12-months (and during the first year, the cumulative total tons of OC/VOC each month).
2. These records, as well as any supporting emission analyses and computations, shall be retained in the company's files (on site) for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for OC/VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall submit quarterly written deviation (excursion) reports of any daily, monthly, and/or yearly records showing that the calculated OC/VOC emissions, exceeded the applicable OC/VOC emission limitations. If no such instances have occurred during a particular quarter, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If reports or documented material(s) contain confidential information, submit a sanitized version along with the required reports.

E. Testing Requirements

1. Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission limitation:

234 pounds OC/VOC per day

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C., Monitoring and/or Recordkeeping Requirements and the following equation:

AP-42, Section 5.2 (1/95), "Loading loss equation"

$$E = (12.46 * S * P * M) / T$$

Where

E = OC/VOC emission factor, pounds OC/VOC per 1000 gallons

S = Saturation factor (1.45 for splash filling; 0.6 for submerged filling dedicated normal service tank, and 0.5 for submerged filling clean tank, Table 5.2-1)

P = Vapor pressure of material loaded at T, in pounds per square inch absolute

M = Molecular weight of material loaded

T = Temperature of material loaded, degrees Rankine, $R^{\circ} = 460 + \text{degrees Fahrenheit}$

i = Index number

n = Total number of materials, days, months, or emission factors

$$\text{OC/VOC emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per day}), \text{ pounds OC/VOC per day}$$

b. Emission limitation:

9.31 tons OC/VOC per rolling 12 month period

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C., Monitoring and/or Recordkeeping Requirements and the following equation:

$$\text{OC/VOC emissions} = \sum (\text{pounds OC/VOC per first day} + \dots + \text{pounds OC/VOC per last day of the month}) * \text{ton}/2000 \text{ pounds} = \text{total pounds OC/VOC per month} * \text{ton}/2000 \text{ pounds} = \text{total tons OC/VOC per month}$$

Current month	Previous 11 months	Total 12-month
Tons of OC/VOC	+ tons of OC/VOC	≤ 9.31 tons of OC/VOC

F. Miscellaneous Requirements

None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Drum and container filling operation. Drum Filling Station #1.	OAC rule 3745-31-05 (A)(3)	OC (organic compounds) and VOC (volatile organic compounds) emissions shall not exceed 8 pounds per hour, 40 pounds per day and 7.3 tons per year.
	OAC rule 3745-21-07 (G)(2)	Equivalent to OAC 3745-31-05 (A)(3).

2. **Additional Terms and Conditions**

- 2.a None.

B. Operational Restrictions

1. The Best Available Technology determination for this emissions unit is the use of submerged filling or bottom filling system for all containers and tote containers with a capacity of 35 gallons or more.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the OC/VOC throughput in the emissions unit:
 - a. the name and identification number of each OC/VOC;
 - b. the volume of each OC/VOC product in gallons;
 - c. the density of each OC/VOC product;
 - d. the vapor pressure of each OC/VOC product in pounds per square inch absolute;
 - e. the molecular weight of each OC/VOC product;
 - f. the temperature of each OC/VOC product in degrees Rankine, R;

- g. the total OC/VOC emissions rates for all products in pounds per hour;
 - h. the total OC/VOC emissions rates for all products in pounds per day; and,
 - i. the total OC/VOC emissions rates for all products in tons per year.
2. These records, as well as any supporting emission analyses and computations, shall be retained in the company's files (on site) for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the OC/VOC emissions from the drum filling operation exceeded 8 pounds per hour, and the actual OC/VOC emissions for each such hour.
 - b. An identification of each day during which the OC/VOC emissions from the drum filling operation exceeded 40 pounds per day, and the actual OC/VOC emissions for each such day.
 - c. An identification of each year during which the OC/VOC emissions from the drum filling operation exceeded 7.3 tons per year, and the actual OC/VOC emissions for each such year.
2. The permittee shall submit quarterly written deviation (excursion) reports of any daily, monthly, and/or yearly records showing that the calculated OC/VOC emissions, exceeded the applicable OC/VOC emission limitations. If no such instances have occurred during a particular quarter, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If reports or documented material(s) contain confidential information, submit a sanitized version along with the required reports.

E. Testing Requirements

1. Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission limitation:

8 pounds OC/VOC per hour

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C.1. and the following equation:

AP-42, Section 5.2 (1/95), "Loading loss equation"

$$E = \frac{12.46 * S * P * M}{T}$$

Where

E= OC/VOC emission factor, pounds OC/VOC per 1000 gallons

S= Saturation factor (1.45 for splash filling, 0.5 for submerged filling clean tank, Table 5.2-1)

P= Vapor pressure of material loaded at T, in pounds per square inch absolute

M= Molecular weight of material loaded

T= Temperature of material loaded, degrees Rankine, R ® = 460 + degrees Fahrenheit)

i = Index number

n = Total number of materials, days, months, or emission factors

$$\text{OC/VOC emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per hour}), \text{ pounds OC/VOC per hour}$$

b. Emission limitation:

40 pounds OC/VOC per day

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C.1., Monitoring and/or Recordkeeping Requirements, the AP-42, Section 5.2 (1/95), "Loading loss equation" and the following equation:

E = OC/VOC emission factor, pounds OC/VOC per 1000 gallons

$$\text{OC/VOC emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per day}), \text{ pounds OC/VOC per day}$$

c. Emission limitation:

7.3 tons OC/VOC per rolling 12 month period

ChemCentral

PTI Application: **13-2953**

Date: To be entered upon final issuance

Facility ID: **1318557875**

Emissions Unit ID: **P001**

Applicable Compliance Method:

A one-time calculation of annual potential to emit based upon 40 pounds/day times 365 days/year times 1 ton/2000 pounds shall suffice.

F. Miscellaneous Requirements

None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Drum and container filling operation. Drum Filling Station #2.	OAC rule 3745-31-05 (A)(3)	OC (organic compounds) and VOC (volatile organic compounds) emissions shall not exceed 8 pounds per hour, 40 pounds per day and 7.3 tons per year.
	OAC rule 3745-21-07 (G)(2)	Equivalent to OAC 3745-31-05 (A)(3).

2. **Additional Terms and Conditions**

- 2.a None.

B. Operational Restrictions

1. The Best Available Technology determination for this emissions unit is the use of submerged filling or bottom filling system for all containers and tote containers with a capacity of 35 gallons or more.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the OC/VOC throughput in the emissions unit:
 - a. the name and identification number of each OC/VOC;
 - b. the volume of each OC/VOC product in gallons;
 - c. the density of each OC/VOC product;
 - d. the vapor pressure of each OC/VOC product in pounds per square inch absolute;
 - e. the molecular weight of each OC/VOC product;
 - f. the temperature of each OC/VOC product in degrees Rankine, R;

- g. the total OC/VOC emissions rates for all products in pounds per hour;
 - h. the total OC/VOC emissions rates for all products in pounds per day; and,
 - i. the total OC/VOC emissions rates for all products in tons per year.
2. These records, as well as any supporting emission analyses and computations, shall be retained in the company's files (on site) for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
- a. An identification of each hour during which the OC/VOC emissions from the drum filling operation exceeded 8 pounds per hour, and the actual OC/VOC emissions for each such hour.
 - b. An identification of each day during which the OC/VOC emissions from the drum filling operation exceeded 40 pounds per day, and the actual OC/VOC emissions for each such day.
 - c. An identification of each year during which the OC/VOC emissions from the drum filling operation exceeded 7.3 tons per year, and the actual OC/VOC emissions for each such year.
2. The permittee shall submit quarterly written deviation (excursion) reports of any daily, monthly, and/or yearly records showing that the calculated OC/VOC emissions, exceeded the applicable OC/VOC emission limitations. If no such instances have occurred during a particular quarter, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If reports or documented material(s) contain confidential information, submit a sanitized version along with the required reports.

E. Testing Requirements

1. Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
- a. Emission limitation:

8 pounds OC/VOC per hour

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C.1. and the following equation:

AP-42, Section 5.2 (1/95), "Loading loss equation"

$$E = \frac{(12.46 * S * P * M)}{T}$$

Where

E= OC/VOC emission factor, pounds OC/VOC per 1000 gallons

S= Saturation factor (1.45 for splash filling, 0.5 for submerged filling clean tank, Table 5.2-1)

P= Vapor pressure of material loaded at T, in pounds per square inch absolute

M= Molecular weight of material loaded

T= Temperature of material loaded, degrees Rankine, $R^{\circ} = 460 + \text{degrees Fahrenheit}$

i = Index number

n = Total number of materials, days, months, or emission factors

$$\text{OC/VOC emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per hour}), \text{ pounds OC/VOC per hour}$$

b. Emission limitation:

40 pounds OC/VOC per day

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C.1., Monitoring and/or Recordkeeping Requirements, the AP-42, Section 5.2 (1/95), "Loading loss equation" and the following equation:

E = OC/VOC emission factor, pounds OC/VOC per 1000 gallons

$$\text{OC/VOC emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per day}), \text{ pounds OC/VOC per day}$$

c. Emission limitation:

7.3 tons OC/VOC per rolling 12 month period

ChemCentral

PTI Application: **13-2953**

Date: To be entered upon final issuance

Facility ID: **1318557875**

Emissions Unit ID: **P002**

Applicable Compliance Method:

A one-time calculation of annual potential to emit based upon 40 pounds/day times 365 days/year times 1 ton/2000 pounds shall suffice.

F. Miscellaneous Requirements

None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Drum and container filling operation. Drum Filling Station #3.	OAC rule 3745-31-05 (A)(3)	OC (organic compounds) and VOC (volatile organic compounds) emissions shall not exceed 8 pounds per hour, 40 pounds per day and 7.3 tons per year.
	OAC rule 3745-21-07 (G)(2)	Equivalent to OAC 3745-31-05 (A)(3).

2. **Additional Terms and Conditions**

- 2.a None.

B. Operational Restrictions

1. The Best Available Technology determination for this emissions unit is the use of submerged filling or bottom filling system for all containers and tote containers with a capacity of 35 gallons or more.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the OC/VOC throughput in the emissions unit:
 - a. the name and identification number of each OC/VOC;
 - b. the volume of each OC/VOC product in gallons;
 - c. the density of each OC/VOC product;
 - d. the vapor pressure of each OC/VOC product in pounds per square inch absolute;
 - e. the molecular weight of each OC/VOC product;
 - f. the temperature of each OC/VOC product in degrees Rankine, R;

- g. the total OC/VOC emissions rates for all products in pounds per hour;
 - h. the total OC/VOC emissions rates for all products in pounds per day; and,
 - i. the total OC/VOC emissions rates for all products in tons per year.
2. These records, as well as any supporting emission analyses and computations, shall be retained in the company's files (on site) for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
- a. An identification of each hour during which the OC/VOC emissions from the drum filling operation exceeded 8 pounds per hour, and the actual OC/VOC emissions for each such hour.
 - b. An identification of each day during which the OC/VOC emissions from the drum filling operation exceeded 40 pounds per day, and the actual OC/VOC emissions for each such day.
 - c. An identification of each year during which the OC/VOC emissions from the drum filling operation exceeded 7.3 tons per year, and the actual OC/VOC emissions for each such year.
2. The permittee shall submit quarterly written deviation (excursion) reports of any daily, monthly, and/or yearly records showing that the calculated OC/VOC emissions, exceeded the applicable OC/VOC emission limitations. If no such instances have occurred during a particular quarter, a written report stating this shall be submitted. These written reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter. If reports or documented material(s) contain confidential information, submit a sanitized version along with the required reports.

E. Testing Requirements

1. Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
- a. Emission limitation:

8 pounds OC/VOC per hour

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C.1. and the following equation:

AP-42, Section 5.2 (1/95), "Loading loss equation"

$$E = \frac{(12.46 * S * P * M)}{T}$$

Where

E= OC/VOC emission factor, pounds OC/VOC per 1000 gallons

S= Saturation factor (1.45 for splash filling, 0.5 for submerged filling clean tank, Table 5.2-1)

P= Vapor pressure of material loaded at T, in pounds per square inch absolute

M= Molecular weight of material loaded

T= Temperature of material loaded, degrees Rankine, $R^{\circ} = 460 + \text{degrees Fahrenheit}$

i = Index number

n = Total number of materials, days, months, or emission factors

$$\text{OC/VOC emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per hour}), \text{ pounds OC/VOC per hour}$$

b. Emission limitation:

40 pounds OC/VOC per day

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in Section C.1., Monitoring and/or Recordkeeping Requirements, the AP-42, Section 5.2 (1/95), "Loading loss equation" and the following equation:

E = OC/VOC emission factor, pounds OC/VOC per 1000 gallons

$$\text{OC/VOC emissions} = \sum_{i=1}^n E_i * (1000 \text{ gallons OC/VOC}_i \text{ per day}), \text{ pounds OC/VOC per day}$$

c. Emission limitation:

7.3 tons OC/VOC per rolling 12 month period

ChemCentral

PTI Application: **13-2953**

Date: To be entered upon final issuance

Facility ID: **1318557875**

Emissions Unit ID: **P003**

Applicable Compliance Method:

A one-time calculation of annual potential to emit based upon 40 pounds/day times 365 days/year times 1 ton/2000 pounds shall suffice.

F. Miscellaneous Requirements

None.