

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **13-04568**

A. Source Description

This emissions unit is a solvent-borne coatings mixer (ME-1260) and associated packaging equipment (P025) owned by Ashland Specialty Chemical Company in Cuyahoga Heights, Ohio. This emissions unit will be controlled by the Building 12 Baghouse.

B. Facility Emissions and Attainment Status

The facility has a worst-case potential to emit (PTE) of a single HAP (methanol) of 9.67 tons/year without the addition the new coatings mixer, P025. Organic compound emissions at PTE are 26.67 tons/year. At the present time, methanol is the only HAP material utilized. However, due to product changes driven purely by market forces and the facility is a batch operation, other HAP materials may be utilized in the future.

C. Source Emissions

With the installation and subsequent operation of P025, the facility's PTE of a single HAP (methanol) will be greater than 10 tons/year. Thus, classifying the facility as a major source. Therefore, the facility has chosen to restrict single and combined HAPs to 9.5 tons/year and 24.5 tons/year, respectively.

D. Conclusion

With federally enforceable permit terms and conditions limiting the single HAP and combined HAP usage and emissions for the entire facility to less than 9.5 tons/year for a single HAP and 24.5 tons/year for combined HAPs, this permit is a "Synthetic Minor" to avoid Title V and MACT requirements.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 13-04568

Fac ID: 1318170304

DATE: 11/2/2006

Ashland Specialty Chemical Company
Richard Wright
5200 Blazer Parkway EH and S , DS-4
Dublin, OH 43017

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 **\$750** 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.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

CLAA

PA

CUYAHOGA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **13-04568** FOR AN AIR CONTAMINANT SOURCE FOR
Ashland Specialty Chemical Company

On 11/2/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Ashland Specialty Chemical Company**, located at **4600 East 71st Street, Cuyahoga Heights**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04568:

ME-1260 Mixer and associated container filling equipment and solids charging equipment -- P025

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-04568

Application Number: 13-04568
Facility ID: 1318170304
Permit Fee: **To be entered upon final issuance**
Name of Facility: Ashland Specialty Chemical Company
Person to Contact: Richard Wright
Address: 5200 Blazer Parkway EH and S , DS-4
Dublin, OH 43017

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4600 East 71st Street
Cuyahoga Heights, Ohio**

Description of proposed emissions unit(s):
**ME-1260 Mixer and associated container filling equipment and solids charging equipment --
P025**

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

Ashland Specialty Chemical Company
PTI Application: 13-04568
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1318170304

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

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,

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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.

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

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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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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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

Emissions Unit ID: **P025**

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 ninety (90) 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	4.0
OC/VOC	24.5
(facility-wide)	14.43
PE	0.99
Air Toxic (any single)	9.5
Single HAP	24.5
Combined HAPs	

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.

Operations, Property,
and/or Equipment

Applicable Rules/Requirements

P025 - Mixer (ME-1260) and associated container filling and solids charging equipment controlled by Building 12 Baghouse

OAC rule 3745-31-05(A)(3)

OAC rule 3745-17-07(A)

OAC rule 3745-17-07(B)(1)

Emissions Unit ID: P025

	<u>Applicable Emissions Limitations/Control Measures</u>	
OAC rule 3745-17-08(B)	Organic compound (OC)/volatile organic compound (VOC) emissions shall not exceed 7.99 lbs per hour and 4.0 tons per year.	Reasonably available control measures must be employed sufficiently to minimize or eliminate visible emissions of fugitive dust. See Additional Term and Condition A.2.g below.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 2.0 lbs per hour and 8.76 tons per year.	The emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-07(G)(2)	Fugitive PE shall not exceed 5.67 tons per year	Exempt; See Additional Term and Condition A.2.c below.
OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V and MACT	Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity, as a six-minute average.	See Additional Term and Condition A.2.d below.
	Visible fugitive emissions from roof vents and openings which house the emissions unit shall not exceed 5% opacity, as a six-minute average, during any sixty-minute observation period.	
	See Additional Terms and Conditions A.2.a, A.2.b, and A.2.e below.	
	The visible emission limitation specified by this rule is less stringent than the requirements of OAC rule 3745-31-05(A)(3).	
	The visible emission limitation specified by this rule is less	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The short-term and annual PE limitations are based on the emissions unit's potential to emit. Therefore, daily record keeping or reporting is not required to demonstrate compliance with these limits.
- 2.b** In order to avoid the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxics Policy"), the allowable emissions of toxic air contaminants from this emissions unit shall not exceed 0.99 tons per year for each toxic air contaminant. The total allowable usage of toxic air contaminants shall not exceed the values obtained from the calculations in section B.4 below.
- 2.c** This emissions unit is exempt from the requirements of OAC rule 3745-21-07(G)(2) based on the fact that there is no chemical reaction taking place; there is only mixing occurring in this process.
- 2.d** The total allowable usage and emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units at this facility (listed in section A.2.f below) shall not exceed 9.5 tons per year for any individual HAP or 24.5 tons per year for a combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation.
- 2.e** In accordance with OAC rule 3745-15-05(C)(4), the total of all similar source mixing operations at the facility must not exceed 25.0 tons of OC/VOC per year, in order for any sources to qualify for de minimis status. As specified by rule, the potential to emit shall be used for sources without permit limitations, including the following: ME-1310, 1320, 1330 and 1340. As requested by the permittee, the following emissions units shall not exceed an allowable of 17.0 tons of OC/VOC per year, combined: P007, P012, P013, P016, P017, P018, P019, P020, P021 and P025.
- 2.f** The current emissions units located at this facility are P007, P012, P013, P016, P017, P018, P019, P020, P021, P022, P024, P025, T002, T003, T004, T005, Tank #010 (500-gallon methanol), Tank #006 (9,540-gallon mineral seal oil), Mixers: ME-1310, ME-1320, ME-1330, ME-1340, 20 small additives tanks located in Building 3 (each with a capacity of less than 700 gallons). This list includes all "De Minimis" and PTI exempt sources.
- 2.g** The permittee shall install and use hoods, fans, and other equipment to

**Ashla
PTI A**

Emissions Unit ID: **P025**

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adequately enclose, contain, capture, vent and sufficiently minimize or eliminate fugitive dust.

B. Operational Restrictions

1. The permittee shall operate the Building 12 Baghouse whenever this emissions unit is in operation.
2. The pressure drop across the Building 12 Baghouse shall be maintained within the range of 0.5 - 8.0 inches of water while the emissions unit is in operation.
3. The maximum annual solvent usage shall not exceed 7,015,000 pounds.
4. The permittee shall determine emission factors (EF) established by the following equation for HAP and OC/VOC emissions that are air toxics for each solvent employed in the mixing operation taken from AP-42, Volume 1, Fifth Edition (January, 1995), section 5.2, "Transportation And Marketing Of Petroleum Liquids" for each solvent:

$$EF = (12.46SPM/T)/D$$

Where:

EF = pounds per 1000 pounds (lb per 1000 lbs) of liquid loaded

S = saturation factor

P = true vapor pressure of liquid loaded, pounds per square inch absolute (psia)

M = molecular Weight of material loaded

T = temperature of liquid loaded, °R (°F + 460)

D = density of the material loaded

The total throughput of each solvent containing toxic air contaminants shall be restricted using the following equation:

$$(0.99 \text{ tons/yr} \times 2000 \text{ lbs/ton}) / EF = RT$$

Where:

EF = pounds per 1000 pounds (lb per 1000 lbs) of liquid loaded

RT = restricted throughput limit for each solvent containing toxic air contaminants or HAPs, in pounds per rolling, 12-month period

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the

Emissions Unit ID: P025

Building 12 Baghouse was not in service while the emissions unit was in operation.

2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the Building 12 Baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drops across the Building 12 Baghouse on a daily basis.
3. The permittee shall collect and record the following information for the mixer each month:
 - a. the company identification for each solvent employed and whether or not the solvent contains toxic air contaminants; and
 - b. the number of pounds of each solvent containing toxic air contaminants employed.
4. The permittee shall collect and record the following information for the mixer annually:
 - a. the company identification for each solvent employed that contains toxic air contaminants;
 - b. the throughput restriction, as calculated in section B.4 above, for any solvents identified as containing toxic air contaminants; and
 - c. the total number of pounds of each solvent containing toxic air contaminants employed (sum of section C.3.b above).
5. The permittee shall collect and record the following information each month for the entire facility (list of emissions units identified in section A.2.f):
 - a. the name and identification number of each HAP and OC/VOC containing material employed;
 - b. the emission factor for each HAP and OC/VOC, in lbs/1000 lbs material employed;
 - c. the number of pounds of each HAP and OC/VOC containing material employed;
 - d. the total individual HAP emissions from all HAP containing materials, in pounds

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- or tons per month [for each HAP the sum of (b) times (c) for each material];
- e. the total combined HAP emissions from all HAP containing materials, in pounds or tons per month [the sum of all individual HAP in d];
 - f. the total OC/VOC emissions from all OC/VOC containing materials, in pounds or tons per month [for each OC/VOC the sum of (b) times (c) for all materials];
 - g. the updated rolling, 12-month summation of usage and emissions for each individual HAP, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of this permit, this shall be a cumulative total for all months since the issuance of the PTI;
 - h. the updated rolling, 12-month summation of usage and emissions for total combined HAPs, in tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of this permit, this shall be a cumulative total for all months since the issuance of the PTI; and
 - i. the 12-month summation of emissions for all OCs/VOCs, in tons. This shall be a summation of the monthly emissions from January 1st through December 31st.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Cleveland Division of Air Quality (Cleveland DAQ) contact. This information does not have to be kept on an individual emission unit basis.

- 6. The permittee shall maintain monthly records of all solvent usage for this emissions unit, in pounds.
- 7. The permittee shall maintain monthly records for the list of emissions units referenced in section A.2.e., similar source mixing operations, for the purpose of determining annual OC/VOC emissions, in tons. The permittee shall also collect and record, for the list of emissions units in section A.2.e., the 12-month summation of emissions for all OCs/VOCs, in tons. This shall be a summation of the monthly emissions from January 1st through December 31st.

D. Reporting Requirements

- 1. The permittee shall notify the Cleveland Division of Air Quality (Cleveland DAQ) in writing of any record showing that the Building 12 Baghouse was not in service when

Emissions Unit ID: **P025**

the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Cleveland DAQ within 30 days after the event occurs.

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports to the Cleveland DAQ that identify all period of time during which the pressure drops across the Building 12 Baghouse did not comply with the allowable ranges specified above. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit deviation (excursion) reports which identify any exceedances of the total throughput of each solvent containing toxic air contaminants as determined by the calculations established in section B.4 and record keeping in section C.4 above. These reports shall be submitted to the Cleveland DAQ within 30 days after the deviation occurs.
4. The permittee shall submit annual reports which identify any exceedances of the annual operating solvent usage limitation specified in section B.3, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit deviation (excursion) reports which include an identification of each month during which the rolling, 12-month individual HAP material usage and emissions for the list of emissions units referenced in section A.2.f exceeded 9.5 tons/year or any combination of HAP material usage and emissions exceeded 24.5 tons/year, based on a rolling, 12 month summation, and the actual rolling, 12 month individual HAP emissions for each such month. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
6. The permittee shall submit annual reports which identify any exceedances of the annual OC/VOC emissions specified in section A.2.e for the list of emissions units referenced in section A.2.e, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
OC/VOC emissions shall not exceed 7.99 lbs per hour.

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Applicable Compliance Method:

Compliance with the mass emissions limitation shall be determined by using the following one-time calculation for potential to emit:

$$(U)(EF) = 7.99 \text{ lb OC/VOC per hour}$$

Where:

U = Maximum Usage Solvent Usage, 7,025 pounds per hour (Acetone)

EF = Emissions factor as developed by the equation in section B.4 above, 1.14 lb OC/VOC per 1000 lbs (Acetone)

U.S. EPA Method 24 shall be used to determine the OC/VOC content for each coating material produced. If it is determined to the satisfaction of the Director that each coating formulation data is equivalent to the Method 24 results, formulation data based on weight percentage of OC/VOC components in the coating may be used. In the event of any inconsistency between a Method 24 test and the facility's formulation data, the Method 24 test will govern.

If required by Ohio EPA of the Cleveland DAQ, compliance with the OC/VOC emission limitation shall be determined through emission testing conducted in accordance with U.S. EPA Method 25 or 25A of 40 CFR Part 60, Appendix A, or any Ohio EPA approved alternative testing method.

- b. Emission Limitation:
OC/VOC emissions shall not exceed 4.0 tons per year.

Applicable Compliance Method:

The ton/year limitation was developed by multiplying the emissions factor for the worst case solvent (1.14 lb OC/VOC per 1000 lbs) by the operating usage restriction in section B.3, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the operating usage restriction, compliance will also be shown with the annual limitation.

- c. Emission Limitation:
PE shall not exceed 2.0 lbs per hour.

Applicable Compliance Method:

Compliance with the mass emission limitation shall be determined by using the following one-time calculation for potential to emit:

Ashland Specialty Chemical Company

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$$E = (W)(F)(1-CE)$$

where

E = emissions

W = weight of solids charged (6,677 lbs/hour)

F = emission factor (1%)

CE = control efficiency (97%)

If required by Ohio EPA of the Cleveland DAQ, compliance with the PE limitation shall be determined through emission testing conducted in accordance with U.S. EPA Method 5 of 40 CFR Part 60, Appendix A, or any Ohio EPA approved alternative testing method.

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PTI A**Emissions Unit ID: **P025****Issued: To be entered upon final issuance**

- d. Emission Limitation:
PE shall not exceed 8.76 tons per year

Applicable Compliance Method:

The annual limitation was developed by multiplying the pound per hour limitation by the maximum operating schedule of 8,760 hours per year, and dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitation:
Fugitive PE shall not exceed 5.67 tons per year

Applicable Compliance Method:

Compliance with the mass emission limitation shall be determined by using the following one-time calculation for potential to emit:

$$E = \{[(W)(F) - 2.0 \text{ lbs/hour}](1-CE)\}(8760 \text{ hrs/yr})(1 \text{ ton}/2000 \text{ lbs})$$

where,

E = emissions

W = weight of solids charged (6,677 lbs/hour)

F = emission factor (1%)

CE = capture efficiency (98%)

- f. Emission Limitation:
Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 5% opacity, as a six-minute average.

Applicable Compliance Method:

If required by the Ohio EPA or Cleveland DAQ, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA Reference Method 9.

- g. Emission Limitation:
0.99 tons per year for each toxic air contaminant

Applicable Compliance Method:

Compliance shall be determined by the calculations established in section B.4 and the record keeping and reporting sections C.4 and D.3.

Ashla

PTI A

Emissions Unit ID: **P025**

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- h. Emission Limitation:
9.5 tons individual HAPs per year for the list of emissions units in section A.2.f,
as a 12-month, rolling summation.

**Ashla
PTI A**

Emissions Unit ID: **P025**

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Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in section C.5.

- i. Emission Limitation:
24.5 tons combined HAPs per year for the list of emissions units in section A.2.f, as a 12-month, rolling summation.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in section C.5.

- j. Emission Limitation:
17.0 tons OC/VOC emissions per year for the list of emissions units in section A.2.e.
25.0 tons OC/VOC emissions per year for all similar source mixing operations.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in section C.5 and C.7.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum restricted annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.