John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

7/3/2014

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. DEAN SARES
UNIVAR USA INC - HAMILTON BRANCH
1686 E HIGHLAND RD
TWINSBURG, OH 44087

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1409040657
Permit Number: P0117201
Permit Type: Administrative Modification
County: Butler

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: SWOAQA

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
UNIVAR USA INC - HAMILTON BRANCH

Facility ID:	1409040657
Permit Number:	P0117201
Permit Type:	Administrative Modification
Issued:	7/3/2014
Effective:	7/3/2014
Expiration:	6/18/2019

Division of Air Pollution Control
Permit-to-Install and Operate
for
UNIVAR USA INC - HAMILTON BRANCH

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Authorization

Facility ID:	1409040657
Application Number(s):	M0002870
Permit Number:	P0117201
Permit Description:	Administrative modification to correct the permit expiration date.
Permit Type:	Administrative Modification
Permit Fee:	$0.00
Issue Date:	7/3/2014
Effective Date:	7/3/2014
Expiration Date:	6/18/2019

Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

UNIVAR USA INC - HAMILTON BRANCH
12 Standen Drive
Hamilton, OH 45015

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0117201
Permit Description: Administrative modification to correct the permit expiration date.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Blend Tanks P004, P005

Emissions Unit ID:	**P004**
Company Equipment ID:	Blend Tank #1
Superseded Permit Number:	P0116665
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	Blend Tank #2
Superseded Permit Number:	P0116665
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee.This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee.Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. “Shut down” means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) 2., 3., 4., and 5.

2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from the Univar USA Hamilton Branch (Premise 1409040657) emissions units P001 (Transport Loading Operation), P002 (Drum Loading Operation), P003 (Can Filling Operation), P004 (Solvent Blending No. 1), P005 (Solvent Blending No. 2), P009 (Blend Tank No. 6), P011 (Drum Mixing Unit), T001 – T024 (Storage Tanks), other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 tons per year (TPY) for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

   The permittee has existing records of existing sources to demonstrate compliance with this limitation upon issuance of this permit.

3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:

   a) The name and identification number of each product or material processed or employed including solvents stored, solvents blended, and solvents packaged;

   b) The individual HAP* content for each HAP of each solvent, in pounds of individual HAP per gallon of solvent, as processed or employed;

   c) The total combined HAP content of each solvent in pounds of combined HAPs per gallon of solvent, as processed or employed [sum all the individual HAP contents from b)];

   d) The number of gallons of each solvent processed or employed;

   e) The total individual HAP emissions for each HAP from all solvents processed or employed, in pounds or tons per month [for each HAP the sum of b) times d) times the appropriate emission factor for each organic solvent];

   f) The total combined HAP emissions from all solvents processed or employed, in pounds or tons per month [the sum of c) times d) times the appropriate emission factor for each organic solvent];

g) The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

h) The updated rolling, 12-month summation of emissions for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southwest Ohio Air Quality Agency (SWOAQA).

4. The permittee shall notify SWOAQA of any exceedance of the HAP emission limitations specified in 2. above. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

5. Compliance with the emission limitations in 2. of these terms and conditions shall be determined in accordance with the following method(s) identified below:

a) Emission Limitations:

Actual emissions of Hazardous Air Pollutants (HAPs) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, as a 12-month rolling summation, as specified in 2. above.

Applicable Compliance Method:

Compliance with the 12-month rolling HAP limitations shall be demonstrated by the record keeping identified in 3. above.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Blend Tanks P004, P005: P004,P005,

EU ID	Operations, Property and/or Equipment Description
P004	Solvent Blend Tank No. 1
P005	Solvent Blend Tank No. 2

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(2), d)(3), and d)(4).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions of volatile organic compounds (VOC) from loading losses and mixing losses (surface evaporation) shall not exceed 269.34 pounds per day from P004 and P005, combined. Emissions of VOC from loading losses and mixing losses (surface evaporation) shall not exceed 2.88 tons per year (TPY) from P004 and P005, combined. See b)(2)a, b)(2)b. and c)(1).

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations and the use of submerged fill (bottom filling method) for emissions units P004 and P005.

b. The daily emission limitation outlined above is based upon the emissions unit's potential to emit (PTE). Therefore, no daily records are required to demonstrate compliance with this limit.

c) Operational Restrictions

(1) The maximum annual throughput of blended solvents shall not exceed 960,000 gallons from emissions units P004 and P005, combined.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for emissions units P004 and P005 combined:

a. the company identification of each solvent (organic compound) employed/blended;

b. the number of gallons of each solvent (organic compound) employed/blended;

c. the organic compound content of each solvent (organic compound), in pounds per gallon;

d. the number of gallons of all solvents (organic compound) employed/blended in emissions units P004 and P005 combined;

e. the molecular weight of each organic compound, in lb-lb mole;

f. the gas-phase mass transfer coefficient (Kx) for each organic compound employed in the blend, in ft/sec:

g. the liquid mass fraction (zx) for each organic compound employed in the blend, in lb/lb;

h. the liquid mole fraction (mx) for each organic compound employed in the blend, in mole/mole;

i. the vapor pressure (Vpx), in psia, and the vapor mole fraction (Yx), in psia, for each organic compound employed in the blend;

j. the partial pressure of each organic compound +(Px), in psia, at temperature, in degrees Rankin and the total pressure for the blend (P), in psia;

k. the vapor molecular weight (M), for all compounds employed in the blend, in lb/lb-mole;

l. the mean ambient temperature, in degrees Rankin;

m. the surface area of the exposure or opening in the blend tank, in square feet; and

n. the total organic compound emission rate for all organic compounds, in pounds per month. The calculation method(s) are outlined in Testing Requirement f)(1)a.

(2) The permit to install and operate for each emissions unit (P004 & P005) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration(MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m^3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 3.39

Predicted 1-Hour Maximum Ground-Level Concentration: 2,669

MAGLC (ug/m^3): 4,485

Pollutant: rubber solvent

TLV (ug/m^3): 1,472,392

Maximum Hourly Emission Rate (lbs/hr): 26.52

Predicted 1-Hour Maximum Ground-Level Concentration: 10,820

MAGLC (ug/m^3): 35,057

(3) Physical changes to or in the method of operation of the emissions unit(s) after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most

recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

(4) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

(5) when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

(1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

Emissions of volatile organic compounds (VOC) from loading losses and mixing losses (surface evaporation) shall not exceed 269.34 pounds per day from P004 and P005, combined.

Applicable Compliance Method:

If required, compliance with the daily VOC emissions limitation shall be demonstrated by calculating the VOC losses from loading the blend tanks and any mixing of the products in the blend tanks subsequent to loading. The permittee shall use the actual batch production information for each batch produced during the day to calculate the actual daily VOC emissions.

The permittee shall calculate the actual monthly VOC emissions to satisfy the Recordkeeping Requirement in d)(1)n. The permittee shall use the actual batch production information for each batch produced during the month to calculate the actual monthly VOC emissions. The actual monthly VOC emissions calculated may be used to demonstrate compliance with the annual VOC emissions limitation.

The permittee may use any of the calculation methods outlined in Emission Inventory Improvement Program (EIIP) Volume II, Chapter 8, Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, February 2005, and AP-42, Fifth Edition, Chapter 5.2, Transportation and Marketing of Petroleum Liquids, July 2008, to calculate the actual daily and monthly VOC emissions.

The applicable emission limitation was established based on information provided by the permittee in application A0047237 for PTIO P0113478 using the emission factor from AP-42, Fifth Edition, Chapter 5.2, Transportation and Marketing of Petroleum Liquids, July 2008, to calculate Loading Losses (LL) and Emission Inventory Improvement Program (EIIP) Volume II, Chapter 8, Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities, February 2005, to calculate mixing losses (surface evaporation). Rubber solvent was used as the worst case emitting organic compound. Batch data was also provided by the permittee in application A0047237:

LL = 12.46 SPM/T AP-42 Equation 1

where:

LL = loading loss, pounds per 1000 gallons (lb/10^3 gal) of liquid loaded

S = a saturation factor (see Table 5.2-1; 0.6 used in calculation)

P = true vapor pressure of liquid loaded, pounds per square inch absolute (psia) (see Section 7.1, "Organic Liquid Storage Tanks"; 3.48 used in calculation)

M = molecular weight of vapors, pounds per pound-mole (lb/lb-mole) (see Section 7.1, "Organic Liquid Storage Tanks"; 90 used in calculation)

T = temperature of bulk liquid loaded, °R (°F + 460); 70°F used in calculation

LL = 12.46 (0.6)(3.48)(90)/(530) for rubber solvent

LL = 4.42 pounds VOC/1000 gallons of liquid loaded

8000 gallons/batch/tank x 3 batches/day x 4.42 pounds VOC/1000 gallons = 106.08 pounds VOC/day/tank

106.08 pounds VOC/day/tank x 2 tanks = 212.16 pounds VOC/day P004 & P005, combined

$K_x = 0.00438 \times U^{0.78} \times (18/M_x)^{1/3}$ EIIP Equation 8.4-21

where:

K_x = gas-phase mass transfer coefficient for VOC species x (ft/sec)

U = wind speed (mile/hr); 0.1 used in calculation

M_x = molecular weight of VOC species x (lb/lb-mole); 90 used in calculation

$K_x = 0.00438 \times (0.1)^{0.78} \times (18/90)^{1/3}$

$K_x = 0.000425093$

$E_x = [M_x \times K_x \times A \times P_x \times 3600 \times H]/[R \times T]$ EIIP Equation 8.4-22, modified

where

E_x = emissions of VOC species x (lb/batch)

M_x = molecular weight of VOC species x (lb/lb-mole); 90 used in calculation

K_x = gas-phase mass transfer coefficient for VOC species x (ft/sec); 0.000425093 used in calculation

A = surface area of exposure or opening of tank (ft^2); 113.09 used in calculation

P_x = true vapor pressure of VOC x (if a pure chemical is used) or the partial pressure of chemical x (if a mixture of VOCs is used) at temperature T (psia)[2]; 3.48 used in calculation

3600 = 3600 sec/hr

H = batch time (hr/batch); 1 used in calculation

R = universal gas constant at 1 atmosphere of pressure, 10.73 psia-ft^3/°R-lb mole;

T = temperature of the liquid, °R (°F+460); 70°F used in calculation

E_x = [(90) x (0.000425093) x (113.09) x (3.48) x 3600 x (1)]/[(10.73) x (530)] for rubber solvent

E_x = 54204.13/5686.9

E_x = 9.53 pounds VOC/batch

3 batches/day/tank x 9.53 pounds VOC/batch = 28.59 pounds VOC/day/tank

28.59 pounds VOC/day/tank x 2 tanks = 57.18 pounds VOC/day P004 & P005, combined

212.16 pounds VOC/day P004 & P005, combined + 57.18 pounds VOC/day P004 & P005, combined = 269.34 pounds VOC/day P004 & P005, combined

b. Emissions Limitation:

Emissions of VOC from loading losses and mixing losses (surface evaporation) shall not exceed 2.88 tons per year (TPY) from P004 and P005, combined.

Applicable Compliance Method:

Compliance with the annual VOC emissions limitation shall be demonstrated by a summation of the monthly VOC emissions, calculated using the method(s) outlined in f)(1)a., for 12 consecutive months.

The applicable emission limitation was established based on information provided by the permittee in application A0047237 for PTIO P0113478 using the emission factors as calculated in f)(1)a. Rubber solvent was used as the worst case emitting organic compound. Annual production (throughput) data and actual batch data was also provided by the permittee in application A0047237:

960,000 gallons P004 & P005, combined/year x 4.42 pounds VOC/1000 gallons x 1 Ton/2000 pounds = 2.12 TPY VOC P004 & P005, combined

960,000 gallons P004 & P005, combined/year x batch/6000 gallons x 9.53 pounds VOC/batch x 1 Ton/2000 pounds = 0.76 TPY VOC P004 & P005, combined

2.12 TPY VOC P004 & P005, combined + 0.76 TPY VOC P004 & P005, combined = 2.88 TPY VOC P004 & P005, combined

g) Miscellaneous Requirements

(1) None.