

Synthetic Minor Determination and/or Netting Determination

Permit To Install 14-05346

A. Source Description

ChemCentral is a facility which blends and repackages solvents and chemicals. This PTI is for the addition of two storage tanks to the facility.

B. Facility Emissions and Attainment Status

ChemCentral is a minor stationary facility. The facility is located in Butler County which is non-attainment for ozone and attainment for all other pollutants. The permittee requests to incorporate federally enforceable limitations in this PTI limiting HAP emissions to less than the major source thresholds.

C. Source Emissions

This permit will limit the facility potential HAP emissions to 9.9 TPY for any individual HAP and 24.9 TPY for combined HAPs. The emissions from the storage tanks are 0.002 TPY of VOC. The facility will keep monthly HAP emission records and submit reports as described in the PTI to ensure compliance with the HAP limits.

D. Conclusion

The terms and conditions in this permit application will limit the HAP emissions to 9.9 TPY for any individual HAP and 24.9 TPY for combined HAPs. Compliance with the emissions limitations will be determined based on a rolling, 12-month summation. The facility will be required to maintain monthly records and submit reports as required by the additional terms and conditions to determine compliance. The HAP emissions will be limited to 9.9 TPY for any individual HAP and 24.9 TPY for combined HAPs, thus the facility will be exempt from the MACT requirements.

Completed by: Mike Ploetz

Date Prepared: August 20, 2002



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

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

CERTIFIED MAIL

Application No: 14-05346

DATE: 9/24/2002

ChemCentral/Cincinnati
David Gibson
PO Box 686 12 Standen Drive
Hamilton, OH 45012

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 **\$200** 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,

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

CC: USEPA

HCDES

OH-KY-IN Regional Council of Gov.

KY

IN



**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 14-05346

Application Number: 14-05346
APS Premise Number: 1409040657
Permit Fee: **To be entered upon final issuance**
Name of Facility: ChemCentral/Cincinnati
Person to Contact: David Gibson
Address: PO Box 686 12 Standen Drive
Hamilton, OH 45012

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

**12 Standen Drive
Hamilton, Ohio**

Description of proposed emissions unit(s):

Installation of two vertical, above ground storage tanks.

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

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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 Director, upon receipt of a written request and within a reasonable time, any

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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

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lead to such sanctions

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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 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

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter

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3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(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> |
|------------------|----------------------|
| VOC | 0.002 |
| Individual HAPs | 9.9 |
| Combined HAPs | 24.9 |

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> |
|---|--------------------------------------|--|
| T023 - 14,500 gallon aboveground vertical storage tank | OAC rule 3745-31-05(A)(3) | 0.001 TPY VOC |
| | | The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and 40 CFR Part 60 Subpart Kb. |
| | OAC rule 3745-31-05(D) | See Term A.2.d |
| | OAC rule 3745-21-09(L) | Exempt |
| | 40 CFR Part 60, Subpart Kb | See Term C.1. |

2. Additional Terms and Conditions

- 2.a The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of submerged fill, minimal emissions and compliance with 40 CFR Part 60 Subpart Kb.
- 2.c The annual emission limitations outlined are based upon the emissions unit's Potential to

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Emissions Unit ID: **T023**

Emit (PTE). Therefore, no records or reports are required to demonstrate compliance with these limits.

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- 2.d** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 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 to demonstrate compliance with this limit upon permit issuance.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. In accordance with 40 CFR Part 60.116b (a) and (b), the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the storage vessel.
2. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each solvent employed including solvents stored, solvents blended, solvents packaged and solvents employed for cleanup;
 - b. the individual Hazardous Air Pollutant (HAP)* content for each HAP of each solvent in pounds of individual HAP per gallon of solvent, as applied;
 - c. the total combined HAP content of each solvent in pounds of combined HAPs per gallon of solvent, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each solvent employed;
 - e. the total individual HAP emissions for each HAP from all solvents 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 employed];
 - f. the total combined HAP emissions from all solvents employed, in pounds or tons per month [the sum of (c) times (d) times the appropriate emission factor for each organic solvent employed];

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

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Emissions Unit ID: **T023**

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- h. the updated rolling, 12-month summation of the combined HAP emissions for all 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 your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in term A.2.d. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
2. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
 - a. Construction date (no later than 30 days after such date);
 - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. Actual start-up date (within 15 days after such date); and
 - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45219

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Issued: To be entered upon final issuance

Emissions Unit ID: T023

E. Testing Requirements

1. Compliance with the emissions limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-05346 submitted August 12, 2002.
2. Compliance with the HAP emission limitations in term A.2.d shall be demonstrated by the recordkeeping in term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., C., D. and E.

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> |
|--|--------------------------------------|--|
| T024 - 14,500 gallon aboveground vertical storage tank | OAC rule 3745-31-05(A)(3) | 0.001 TPY VOC |
| | OAC rule 3745-31-05(D) | The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and 40 CFR Part 60 Subpart Kb. |
| | OAC rule 3745-21-09(L) | See Term A.2.d |
| | 40 CFR Part 60, Subpart Kb | Exempt |
| | | See Term C.1. |

2. Additional Terms and Conditions

- 2.a The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of submerged fill, minimal emissions and compliance with 40 CFR Part 60 Subpart Kb.

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PTI /

Emissions Unit ID: **T024**

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- 2.c** The annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no records or reports are required to demonstrate compliance with these limits.

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- 2.d** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 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 to demonstrate compliance with this limit upon permit issuance.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. In accordance with 40 CFR Part 60.116b (a) and (b), the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the storage vessel.
2. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each solvent employed including solvents stored, solvents blended, solvents packaged and solvents employed for cleanup;
 - b. the individual Hazardous Air Pollutant (HAP)* content for each HAP of each solvent in pounds of individual HAP per gallon of solvent, as applied;
 - c. the total combined HAP content of each solvent in pounds of combined HAPs per gallon of solvent, as applied [sum all the individual HAP contents from (b)];
 - d. the number of gallons of each solvent employed;
 - e. the total individual HAP emissions for each HAP from all solvents 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 employed];
 - f. the total combined HAP emissions from all solvents employed, in pounds or tons per month [the sum of (c) times (d) times the appropriate emission factor for each organic solvent employed];

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PTI /

Emissions Unit ID: **T024**

Issued: To be entered upon final issuance

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

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PTI /

Emissions Unit ID: **T024**

Issued: To be entered upon final issuance

- h. the updated rolling, 12-month summation of the combined HAP emissions for all 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 your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in term A.2.d. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
2. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
 - a. Construction date (no later than 30 days after such date);
 - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. Actual start-up date (within 15 days after such date); and
 - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

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DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45219

E. Testing Requirements

1. Compliance with the emissions limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in PTI 14-05346 submitted August 12, 2002.
2. Compliance with the HAP emission limitation in term A.2.d shall be demonstrated by the recordkeeping in term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., C., D. and E.