

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install **14-05140**

A. Source Description

Queen City Terminals is a storage facility for a wide range of liquid materials. The facility stores these materials in various storage tanks at the facility and then loads them out. This permit will limit the emissions of HAPs from the facility.

B. Facility Emissions and Attainment Status

The facility is located in Hamilton County. Hamilton County is classified as attainment for all criteria pollutants.

C. Source Emissions

The permittee will maintain records of the HAP's which are stored in the tanks and loaded out. They will maintain throughputs for the storage tanks and the loading rack for each HAP containing material. These throughputs will then be used to calculate the HAP emissions from the facility. The facility will maintain HAP emissions so they do not exceed 9.9 TPY of any single HAP and 24.9 TPY of any combination of HAPs.

D. Conclusion

With the federally enforceable terms contained in this permit, the permittee's potential to emit will be limited to less than 10 tons per year of a single HAP and less than 25 tons per year of combined HAPs. As a result, Queen City Terminals will not be considered a major facility for the purpose of Title V permitting or MACT.



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  
HAMILTON COUNTY  
Application No: 14-05140**

**CERTIFIED MAIL**

**DATE: 6/26/2001**

Queen City Terminals  
Gary Sampson  
3806 Kellogg Avenue  
Cincinnati, OH

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 **\$500** will be due. Please do not submit any payment now.

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

Very truly yours,

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

CC: USEPA      HCDES      KY      IN      Ohio-Kentucky-Indiana Reg Council of Gov



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**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 14-05140**

Application Number: 14-05140  
APS Premise Number: 1431072036  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Queen City Terminals  
Person to Contact: Gary Sampson  
Address: 3806 Kellogg Avenue  
Cincinnati, OH 45226

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**3806 Kellogg Avenue  
Cincinnati, Ohio**

Description of proposed emissions unit(s):  
**Fixed Roof Storage Tank for styrene monomer.**

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

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Director

Queen City Terminals

PTI Application: 14-05140

Issued: To be entered upon final issuance

Facility ID: 1431072036

## 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

**Queen City Terminals**  
**PTI Application: 14-05140**

**Facility ID: 1431072036**

**Issued: To be entered upon final issuance**

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

**Queen City Terminals**

**PTI Application: 14-05140**

**Issued: To be entered upon final issuance**

lead to such sanctions

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**Queen City Terminals**  
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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 3745-77, the permittee shall submit a complete Title V permit application or a complete

**Queen City Terminals**  
**PTI Application: 14-05140**

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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>
OC	2.45

## 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>
T007 - 840,000 gallon Fixed Roof Storage Tank	OAC rule 3745-31-05(A)(3)	2.45 TPY OC  The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb and OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(D)	Exempt
	40 CFR Part 60 Subpart Kb	See term C.1
	OAC rule 3745-31-05(D)	See term A.2.d

### 2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of submerged fill and compliance with 40 CFR Part 60 Subpart Kb.
- 2.b The annual OC emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no records or reports are required to demonstrate compliance with this limit.

**Queen City Terminals**

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**Issue****Facility ID: 1431072036**Emissions Unit ID: **T007**

- 2.c** 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.d** The 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 these limits upon issuance of this permit.

**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 of each HAP\* containing material stored or loaded .
  - b. The vapor pressure of each HAP containing material.
  - c. The throughput, in gallons, of each HAP containing material stored or loaded.
  - d. The total individual HAP emissions for each HAP from all HAP containing materials stored or loaded, in pounds or tons per month. (This shall be calculated by using the appropriate emissions factor for each individual HAP for each HAP containing material).
  - e. The total combined HAP emissions from all HAP containing materials stored or loaded, in pounds or tons per month. [This shall be calculated by adding the emissions from (d) for each individual HAP emitted].
  - f. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding

**Queen City Terminals**  
**PTI**  
**Issue**

**Facility ID: 1431072036**

Emissions Unit ID: **T007**

eleven calendar months.

- g. The updated rolling, 12-month summation for total combined HAP emissions, 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. 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 startup date (not more than 60 days or less than 30 days prior to such date),
  - c. Actual startup 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, OH 43216-3669

and

Hamilton County Department of Environmental Services  
 250 Wm. H. Taft Road  
 Cincinnati, OH 45219

2. 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

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PTI /

Emissions Unit ID: **T007**

**Issued: To be entered upon final issuance**

year. If no exceedances occurred during the reporting period then a report is required stating so.

**E. Testing Requirements**

1. Compliance with emission limitations outlined in this permit shall be demonstrated by the emissions factors, control efficiencies (if applicable), and the operational parameters as submitted in PTI 14-05140 submitted April 23, 2001.
2. Compliance with the HAP 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, B, C, D and E.

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05140 Facility ID: 1431072036

FACILITY NAME Queen City Terminals

FACILITY DESCRIPTION Fixed Roof Storage Tank for styrene monomer. CITY/TWP Cincinnati

SIC CODE 4226 SCC CODE 4-07-036-14 EMISSIONS UNIT ID T007

EMISSIONS UNIT DESCRIPTION 840,000 gallon Fixed Roof Storage Tank

DATE INSTALLED 1978

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	NA	2.45	NA	2.45
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? Kb NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

BAT is determined by the use of submerged fill and compliance with 40 CFR Part 60 Subpart Kb.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05140 Facility ID: 1431072036

FACILITY NAME Queen City Terminals

FACILITY DESCRIPTION Fixed Roof Storage Tank for styrene monomer. CITY/TWP Cincinnati

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
Calculations (required)	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
Modeling form/results	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
BAT Study	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other/misc.	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

[NSR Discussion](#)

Permit Review Narrative  
PTI 14-05140

Queen City Terminals  
3806 Kellogg Avenue  
Cincinnati, OH 45226  
PN: 1431072036

Queen City Terminals has submitted a permit to install (PTI) application for a fixed roof storage tank for styrene monomer. Emissions unit T007 is a 840,000 gallon fixed roof storage tank.

BAT for the storage tank is submerged fill and minimal emissions. The applicable rules are Ohio Administrative Code (OAC) rule 3745-31-05(A)(3), OAC rule 3745-21-07(D), OAC rule 3745-31-05(D) and 40 CFR Part 60, Subpart Kb.

The permit allowable emissions are 2.45 TPY OC.

Permit fees:

T007                      \$500.00

Total Fee:                \$500.00

Prepared by:              Chad Powell  
Date Prepared:            04/30/01

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05140 Facility ID: 1431072036

FACILITY NAME Queen City Terminals

FACILITY DESCRIPTION	Fixed Roof Storage Tank for styrene monomer.	CITY/TWP	Cincinnati
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Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **14-05081**

A. Source Description

Queen City Terminals is a storage facility for a wide range of liquid materials. The facility stores these materials in various storage tanks at the facility and then loads them out. This permit will limit the emissions of HAPs from the facility.

B. Facility Emissions and Attainment Status

The facility is located in Hamilton County. Hamilton County is classified as attainment for all criteria pollutants.

C. Source Emissions

The permittee will maintain records of the HAP's which are stored in the tanks and loaded out. They will maintain throughputs for the storage tanks and the loading rack for each HAP containing material. These throughputs will then be used to calculate the HAP emissions from the facility. The facility will maintain HAP emissions so they do not exceed 9.9 TPY of any single HAP and 24.9 TPY of any combination of HAPs.

D. Conclusion

With the federally enforceable terms contained in this permit, the permittee's potential to emit will be limited to less than 10 tons per year of a single HAP and less than 25 tons per year of combined HAPs. As a result, Queen City Terminals will not be considered a major facility for the purpose of Title V permitting or MACT.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)	
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS	
<u>Pollutant</u>	<u>Tons Per Year</u>
OC	2.45

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05140

Facility ID: 1431072036

FACILITY NAME Queen City Terminals

FACILITY DESCRIPTION Fixed Roof Storage Tank for styrene  
monomer.

CITY/TWP

Cincinnati

**NEW SC**

PTI Num

**FACILITY**

FACILITY DESCRIPTION

Fixed Roof Storage Tank for styrene  
monomer.

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CITY/TWP

Emissions Unit ID: **T007** \_\_\_\_\_

Cincinnati

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