



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
HAMILTON COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

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Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-04634**

**DATE:** 3/4/2003

Queen City Terminals  
Gary Sampson  
3806 Kellogg Avenue  
Cincinnati, OH 45226

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

*Michael W. Ahern*

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

cc: USEPA

HCDES



**Permit To Install  
Terms and Conditions**

**Issue Date: 3/4/2003  
Effective Date: 3/4/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-04634

Application Number: 14-04634  
APS Premise Number: 1431072036  
Permit Fee: **\$0**  
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):  
**Administrative Modification of Storage Tank T021.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

  
Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

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

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. Best Available Technology**

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

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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	6.9

**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>
T021 - 120,000 gallons fixed roof storage tank with closed loop vapor balance system - Modification	OAC rule 3745-31-05(A)(3)	6.9 TPY OC  See terms A.2.a , B.1., B.3.  The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb.
	OAC rule 3745-21-07 (D)	Exempt
	40 CFR Part 60 Subpart Kb	See terms A.2.b, C.1. and C.2.

**2. Additional Terms and Conditions**

- 2.a The maximum true vapor pressure of volatile organic liquids stored in emissions unit T021 shall not exceed 0.754 psia at 70 degrees F.
- 2.b 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.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of submerged fill, a closed loop vapor balance system, and the emissions limitations.

**B. Operational Restrictions**

1. The permittee shall operate and maintain equipment for submerged filling and a closed loop vapor balance system for emissions unit T021.
2. Prior to a change in the material stored (inorganic or organic) in emissions unit T021, the permittee shall provide written notification to Hamilton County Department of Environmental Services. The permittee shall not store any material until they have been notified that compliance has been demonstrated or whether a Permit to Install is required.
3. Vapor Balance Requirements
  - a. For any transfer of methyl methacrylate from the stationary storage tank to a delivery vessel, the vapors displaced from delivery vessel shall be processed by a vapor balance system which is equipped with a vapor tight vapor line from the delivery vessel to the stationary storage tank being unloaded and a means to ensure that the vapor line is connected before methyl methacrylate can be transferred and which is designed and operated to route at least 90 percent by weight of the OC in the displaced vapors to the stationary storage tank.
  - b. The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of methyl methacrylate.
  - c. The delivery vessel hatches shall be closed at all times during the loading and unloading of the delivery vessel.
  - d. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.
  - e. There shall be no leaks in the vapor and liquid lines during the transfer of methyl methacrylate.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee of this storage vessel shall maintain records of each material stored in emissions unit T021, the period of storage, the throughput of each material stored, and the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid.
2. The permittee shall maintain records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Department of Environmental Services which summarize the information in C.1. for each material stored in this emissions unit. The reports shall be submitted by February 15 of each year and shall cover the previous calendar year.
2. The permittee shall notify the Hamilton County Department of Environmental Services within 30 days when the maximum true vapor pressure of the stored liquid exceeds 0.754 psia.
3. Queen City Terminals, Inc. shall notify the Hamilton County Department of Environmental Services in writing at least 30 days before the filling or refilling of this storage tank to afford the opportunity to have an observer present.
4. 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

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

#### **E. Testing Requirements**

1. The permittee shall determine the maximum true vapor pressure according to methods outlined in

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40 CFR Part 60, paragraph 60.116 b(e).

2. Compliance with the emission limitation in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:  
6.9 TPY OC

Applicable Compliance Method:  
Compliance with emissions limitations shall be determined in accordance with the methods and formulas outlined in the USEPA tanks program.

**F. Miscellaneous Requirements**

1. The terms and conditions of this permit to install shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 14-4634 issued on 10/21/98.