



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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-04196

DATE: 8/22/2002

Ashland Inc
Chuck Keener
P.O. Box 2219
Columbus, OH 43216

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: 8/22/2002
Effective Date: 8/22/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-04196

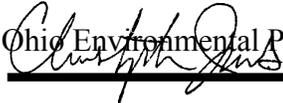
Application Number: 14-04196
APS Premise Number: 1431152467
Permit Fee: **\$0**
Name of Facility: Ashland Inc
Person to Contact: Chuck Keener
Address: P.O. Box 2219
Columbus, OH 43216

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2788 Glendale-Milford Rd
Evendale, Ohio**

Description of proposed emissions unit(s):
Administrative modification to clarify the HAPs term. Permittee wants it clarified that the HAPs limitation is for the entire facility.

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

Ashland Inc

PTI Application: 14-04196

Modification Issued: 8/22/2002

Facility ID: 1431152467

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 Record keeping 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

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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 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	36.3

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>
J001 - Loading rack for chemicals and solvents - Modification	OAC rule 3745-31-05(A)(3)	See T&Cs A.2.a., B.2., B.3., B.4., and B.5.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(E)(1) and 3745-31-05(D).
	OAC rule 3745-21-07(E)(1)	See T&C B.1
	OAC rule 3745-31-05(D)	See T&C A.2.b

2. Additional Terms and Conditions

- 2.a The following organic compound (OC)emissions limitations shall not be exceeded for emissions unit J001:

	<u>tons/month</u>	<u>tons/year</u>
Organic Material	2.3	20.2
Methylene Chloride	0.1	1.02
1,1,1 Trichloroethane	0.05	0.45

- 2.b The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at 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 upon a rolling, 12-month summation.

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Ashland

PTI A

Modification Issued: 8/22/2002

Emissions Unit ID: **J001**

- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limits, throughput limitations and the use of submerged fill.

B. Operational Restrictions

1. The permittee shall limit the loading of any volatile photochemically reactive material as defined in Ohio Administrative Code (OAC) rule 3745-21-01(C)(7) to not exceed 40,000 gallons per day through this emissions unit.
2. This emissions unit shall be equipped with submerged fill.
3. The throughput of organic material, excluding Methylene Chloride and 1,1,1 Trichloroethane, for this emissions unit shall not exceed 13,200,000 gallons per year based upon a rolling, 12-month summation.
4. The throughput of Methylene Chloride for this emissions unit shall not exceed 250,000 gallons per year based upon a rolling, 12-month summation.
5. The throughput of 1,1,1 Trichloroethane for this emissions unit shall not exceed 250,000 gallons per year based upon a rolling, 12-month summation.
6. The permittee has existing records to demonstrate compliance with T&Cs B.3, B.4 and B.5 upon issuance of this permit.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records documenting the following information for this emissions unit:
 - a. The monthly throughput of methylene chloride, in gallons;
 - b. The monthly throughput of 1,1,1- trichloroethane, in gallons;
 - c. The monthly throughput of all other organic materials, in gallons;
 - d. The updated rolling 12-month throughput calculation for each month for methylene chloride, 1,1,1- trichloroethane and all other organic materials; and
 - e. The total organic compound emissions for all organic materials, Methylene Chloride and 1,1,1-trichloroethane in tons per month.
2. The permittee shall keep daily records documenting the throughput, in gallons, of volatile photochemically reactive material loaded through this emissions unit.

3. The permittee shall collect and record the following information each month:
 - a. The name and identification of each HAP loaded or handled.
 - b. The amount of each HAP loaded or handled, in gallons.
 - c. The loading loss emission factor for each HAP, in pounds per 1000 gallons loaded, as determined by the emission factor equation identified in term F.2.
 - d. The total individual HAP emissions for each HAP from each individual HAP loaded, in pounds or tons per month [for each HAP the sum of (b) times (c)]
 - e. The total combined HAP emissions from all HAPs loaded, in pounds or tons per month.
 - f. 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
 - g. The updated rolling, 12-month summation of emissions for the total combined HAP*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- * A listing of 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 an emission unit - by- emission unit basis.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services of any monthly record showing an exceedance of the rolling, 12-month throughput limitation set forth in terms B.3, B.4 and B.5 or the monthly emissions limits in term A.2.a. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any daily record showing an exceedance of the throughput limitation set forth in term B.1. A copy of such record shall be sent to the Director within 30 days following the end of the calendar month.
3. The permittee shall submit semi-annual reports to the Hamilton County Department of Environmental Services which summarizes the information requested in Additional Term and

Emissions Unit ID: **J001**

Condition B.3, B.4, and B.5 . These reports shall be submitted by February 15 and August 15 of each year and shall cover the previous six calendar months (July through December and January through June, respectively).

4. The permittee shall notify the Hamilton County Department of Environmental Services any exceedance of the HAP emissions limitations within 30 days after the exceedance occurs. The permittee shall submit annual reports which identify any exceedance of the HAP emission limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by February 15 of each year and shall cover the previous twelve calendar months. If no exceedances occurred during the reporting period then a report is required stating so.
5. The permittee shall submit annual reports which specify the total organic compound, methylene chloride and 1,1,1- Trichloroethane emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 15 of each year.

E. Testing Requirements

1. Compliance with daily throughput limitation in term B.1 shall be demonstrated by the record keeping in term C.2.
2. Compliance with the annual throughput limitations in terms B.3, B.4, and B.5 shall be demonstrated by the record keeping in term C.1.
3. Compliance with the emission limitations in Part II.A.1 shall be demonstrated by the emission factors, control efficiencies(if applicable) and the operational parameters as submitted in PTI 14-04196 submitted 11/4/96.
4. Compliance with HAP emissions limitation in term A.2.b shall be demonstrated by the record keeping in term C.3.
5. Compliance with the emissions limitation in term A.2.a shall be demonstrated by the record keeping in term C.1.

F. Miscellaneous Requirements

1. The terms and conditions of this permit to install(PTI) supersede the terms and conditions of PTI 14-240 for this emissions unit.
2. The permittee shall receive approval from the Ohio EPA field office prior to loading organic materials, excluding Methylene Chloride and 1,1,1 Trichloroethane, with a loading loss emission

factor greater than 2.9 lbs OC/1000 gallons through emissions unit J001, as determined using either the following loading loss equation from AP-42 Section 4.4 (9/85) or an equation approved by the Ohio EPA field office:

$$LL = 12.46 \text{ SPM/T}$$

where:

LL	=	loading loss, pound per 1000 gallons of liquid loaded,
S	=	a saturation factor,
P	=	true vapor pressure of liquid loaded, pounds per square inch absolute (psia),
M	=	molecular weight of vapors, pound per pound-mole,
T	=	temperature of bulk liquid loaded, °R (°F + 460).

3. The following terms and conditions of this permit are federally enforceable: A., B., 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>	OAC rule 3745-31-05(D)
P006 - Drumming line for organic liquids - Modification	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-07(G)	

Ashland

PTI A

Modification Issued: 8/22/2002

Emissions Unit ID: P006

Applicable Emissions
Limitations/Control Measures

8 lbs/hr OC, 40 lbs/day OC, 7.3
TPY OC

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).

Exempt

See T&C A.2.b

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limits and compliance with the Air Toxics Policy.
- 2.b** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at 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 upon a rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

- 1.** The permittee shall maintain daily records of the following information for the organic material loaded through this emission units:
- a. The name and identification of the organic material drummed or filled (loaded);

- b. The amount of material being drummed or filled, in gallons or 55 gallon drum equivalents;
 - c. The molecular weight of vapors, in pound per pound-mole;
 - d. The vapor pressure of the organic material drummed or filled, in psia;
 - e. The organic compound emission rate in pounds per day;
 - f. The total number of hours the emission unit was in operation; and
 - g. The average hourly organic compound emission rate for all organic material loaded in pounds per hour (average)(e/f).
2. The permittee shall calculate the emissions on an hourly and daily basis from emissions unit P006 by using either the following equation or an equation approved by the Ohio EPA field office:

$$LL = 12.46 \text{ SPM/T}$$

where:

LL	=	loading loss, pound per 1000 gallons of liquid loaded,
S	=	a saturation factor,
P	=	true vapor pressure of liquid loaded, pounds per square inch absolute (psia),
M	=	molecular weight of vapors, pound per pound-mole,
T	=	temperature of bulk liquid loaded, °R (°F + 460).

3. The permittee shall collect and record the following information each month:
- a. The name and identification of each HAP loaded or handled.
 - b. The amount of each HAP loaded or handled, in gallons.
 - c. The loading loss emission factor for each HAP, in pounds per 1000 gallons loaded, as determined by the emission factor equation identified in term C.2.
 - d. The total individual HAP emissions for each HAP from each individual HAP loaded, in pounds or tons per month [for each HAP the sum of (b) times (c)]

Ashland

PTI A

Modification Issued: 8/22/2002

Emissions Unit ID: P006

- e. The total combined HAP emissions from all HAPs loaded, in pounds or tons per month.
 - f. 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
 - g. The updated rolling, 12-month summation of emissions for the 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 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 an emission unit - by- emission unit basis.
4. The permit to install for this emissions unit (P006) 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 this emissions unit 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 : 1, 2, 4 Trichlorobenzene

TLV (ug/m³): 37,100

Maximum Hourly Emission Rate (lbs/hr): 0.65

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 169

MAGLC (ug/m³): 884

Pollutant : Furfural

TLV (ug/m³): 7859

Maximum Hourly Emission Rate (lbs/hr): 0.58

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 78.2

MAGLC (ug/m³): 187

Physical changes to or in the method of operation of the emissions unit after it's 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.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], 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
- c. 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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for this emissions unit which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the organic materials, exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the organic materials, exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 15 of each year.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations within 30 calendar days after the exceedance occurs. The permittee shall submit annual reports which identify any exceedance of the HAP emission limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by February 15 of each year and shall cover the previous twelve calendar months. If no exceedances occurred during the reporting period then a report is required stating so.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the organic compound emission limitations in term A.1 shall be determined by the record keeping required in terms C.1. and C.2.

Ashland Inc
PTI Application: 14-04106
Modif

Facility ID: 1431152467

Emissions Unit ID: **P006**

2. Compliance with HAP emissions limitation in term A.2.b shall be demonstrated by the record keeping in term C.3.

F. Miscellaneous Requirements

1. The terms and conditions of this permit to install (PTI) supersede the terms and conditions of PTI 14-240 for this emissions unit.
2. The following terms and conditions of this permit are federally enforceable: A., C.1 - C.3, D. and E.

Ashland

PTI A

Modification Issued: 8/22/2002

Emissions Unit ID: P007

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>
P007 - Organic tote/pail filling line - Modification	OAC rule 3745-31-05(A)(3)	8 lbs/hr OC, 40 lbs/day OC, 7.3 TPY OC The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)	Exempt
	OAC rule 3745-31-05(D)	See T&C A.2.b.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limits and compliance with the Air Toxics Policy.
- 2.b The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at 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 upon a rolling, 12-month summation.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records of the following information for the organic material loaded through this emissions unit:
 - a. The name and identification of the organic material drummed or filled (loaded);
 - b. The amount of material being drummed or filled, in gallons or 55 gallon drum equivalents;
 - c. The molecular weight of vapors, in pound per pound-mole;
 - d. The vapor pressure of the organic material drummed or filled, in psia;
 - e. The organic compound emission rate in pounds per day;
 - f. The total number of hours the emission unit was in operation; and
 - g. The average hourly organic compound emission rate for all organic material loaded in pounds per hour (average)(e/f).

2. The permittee shall calculate the emissions on an hourly and daily basis from emissions unit P007 by using either the following equation or an equation approved by the Ohio EPA field office:

$$LL = 12.46 \frac{SPM}{T}$$

where:

LL	=	loading loss, pound per 1000 gallons of liquid loaded,
S	=	a saturation factor,
P	=	true vapor pressure of liquid loaded, pounds per square inch absolute (psia),
M	=	molecular weight of vapors, pound per pound-mole,
T	=	temperature of bulk liquid loaded, °R (°F + 460).

3. The permittee shall collect and record the following information each month:

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- a. The name and identification of each HAP loaded or handled.
 - b. The amount of each HAP loaded or handled, in gallons.
 - c. The loading loss emission factor for each HAP, in pounds per 1000 gallons loaded, as determined by the emission factor equation identified in term C.2.
 - d. The total individual HAP emissions for each HAP from each individual HAP loaded, in pounds or tons per month [for each HAP the sum of (b) times (c)]
 - e. The total combined HAP emissions from all HAPs loaded, in pounds or tons per month.
 - f. 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
 - g. The updated rolling, 12-month summation of emissions for the 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 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 an emission unit - by- emission unit basis.
4. The permit to install for this emissions unit (P007) 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 this emissions unit 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 : 1, 2, 4 Trichlorobenzene

TLV (ug/m³): 37,100

Maximum Hourly Emission Rate (lbs/hr): 0.65

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 169

MAGLC (ug/m³): 884

Pollutant : Furfural

TLV (ug/m³): 7859

Maximum Hourly Emission Rate (lbs/hr): 0.58

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m³): 78.2

MAGLC (ug/m³): 187

Physical changes to or in the method of operation of the emissions unit after it's 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.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes,

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the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], 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
- c. 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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for this emissions unit which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the organic materials, exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the organic materials, exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by February 15 of each year.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations within 30 calendar days after the exceedance occurs. The permittee shall submit annual reports which identify any exceedance of the HAP emission limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by February 15 of each year and shall cover the previous twelve calendar months. If no exceedances occurred during the reporting period then a report is required stating

so.

4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the organic compound emission limitations in term A.1 shall be determined by the record keeping required in terms C.1. and C.2.
2. Compliance with HAP emissions limitation in term A.2.b shall be demonstrated by the record keeping in term C.3.

F. Miscellaneous Requirements

1. The terms and conditions of this permit to install(PTI) supersede the terms and conditions of PTI 14-240 for this emissions unit.
2. The following terms and conditions of this permit are federally enforceable: A., C.1 - C.3, D. and E.