Ohio Environmental Protection Agency

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

8/21/2015

Certified Mail

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

DONALD BENEDETTI
STRUKTOL COMPANY
201 E. STEELS CORNERS ROAD
STOW, OH 44224

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1677000120
Permit Number: P0119033
Permit Type: Administrative Modification
County: Summit

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Akron Beacon Journal. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA Region 5*Via E-Mail Notification*
ARAQMD; Pennsylvania; West Virginia; Canada

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:http://epa.ohio.gov/actions.aspx or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Administrative Modification
STRUKTOL COMPANY
201 E. STEELS CORNERS ROAD,, Stow, OH 44224
ID#:P0119033
Date of Action: 8/21/2015
Permit Desc:Administrative modification PTIO to update emissions limitations based on emissions testing for 11 reactors and 15 above ground storage tanks..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Megan Talcott, Akron Regional Air Quality Management District, 1867 West Market St., Akron, OH 44313. Ph: (330)375-2480

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
STRUKTOL COMPANY

Facility ID:	1677000120
Permit Number:	P0119033
Permit Type:	Administrative Modification
Issued:	8/21/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
STRUKTOL COMPANY

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Authorization

Facility ID:	1677000120
Application Number(s):	A0053612
Permit Number:	P0119033
Permit Description:	Administrative modification PTIO to update emissions limitations based on emissions testing for 11 reactors and 15 above ground storage tanks.
Permit Type:	Administrative Modification
Permit Fee:	$1,850.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	8/21/2015
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

STRUKTOL COMPANY
201 E. STEELS CORNERS ROAD
Stow, OH 44224

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

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

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0119033
Permit Description: Administrative modification PTIO to update emissions limitations based on emissions testing for 11 reactors and 15 above ground storage tanks.

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

Group Name: Group 1

Emissions Unit ID:	**P001**
Company Equipment ID:	Reactor 1
Superseded Permit Number:	P0108229
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Reactor 2
Superseded Permit Number:	P0108229
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	Reactor 6
Superseded Permit Number:	P0108229
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P007**
Company Equipment ID:	Reactor 7
Superseded Permit Number:	P0108229
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	Reactor 8
Superseded Permit Number:	P0108229
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P009**
Company Equipment ID:	Reactor 9
Superseded Permit Number:	P0108229
General Permit Category andType:	Not Applicable

Group Name: Group 2

Emissions Unit ID:	**P003**
Company Equipment ID:	Reactor 3
Superseded Permit Number:	P0108229
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	Reactor 4
Superseded Permit Number:	P0108229
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	Reactor 5
Superseded Permit Number:	P0108229
General Permit Category andType:	Not Applicable

Group Name: Group 3

Emissions Unit ID:	**P014**
Company Equipment ID:	Reactor 14
Superseded Permit Number:	P0111259

General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P015**
Company Equipment ID:	Reactor 15
Superseded Permit Number:	P0111259
General Permit Category andType:	Not Applicable

Group Name: Group 4

Emissions Unit ID:	**T002**
Company Equipment ID:	TANK NO. 2
Superseded Permit Number:	P0079388
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T003**
Company Equipment ID:	TANK NO. 3
Superseded Permit Number:	P0079389
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T010**
Company Equipment ID:	TANK NO. 10
Superseded Permit Number:	P0079396
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T011**
Company Equipment ID:	TANK NO. 11
Superseded Permit Number:	P0079397
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T012**
Company Equipment ID:	TANK NO. 12
Superseded Permit Number:	P0079398
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T013**
Company Equipment ID:	Tank 13
Superseded Permit Number:	P0079399
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T014**
Company Equipment ID:	TANK NO. 14
Superseded Permit Number:	P0079400
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T015**
Company Equipment ID:	T 13 Storage Tank
Superseded Permit Number:	P0108676
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T016**
Company Equipment ID:	BLEND TANK
Superseded Permit Number:	P0079386
General Permit Category andType:	Not Applicable

Group Name: Group 5

Emissions Unit ID:	**T004**
Company Equipment ID:	Tank 4
Superseded Permit Number:	P0079390
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T005**
Company Equipment ID:	Tank 5
Superseded Permit Number:	P0079391
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T006**
Company Equipment ID:	Tank 6

Superseded Permit Number:	P0079392
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T007**
Company Equipment ID:	Tank 7
Superseded Permit Number:	P0079393
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T008**
Company Equipment ID:	Tank 8
Superseded Permit Number:	P0079394
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**T009**
Company Equipment ID:	Tank 9
Superseded Permit Number:	P0079395
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Group 1: P001, P002, P006, P007, P008, P009

EU ID	Operations, Property and/or Equipment Description
P001	1,500 gallon fatty acid reactor
P002	1,500 gallon fatty acid reactor
P006	1,500 gallon fatty acid reactor
P007	1,500 gallon fatty acid reactor
P008	1,500 gallon fatty acid reactor
P009	1,500 gallon fatty acid reactor

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from emissions units P001, P002, P006-P009, P014, P015, and P024-P030, combined, shall not exceed 8.52 pounds per hour and 37.3 tons per year. Particulate emissions (PE) from emissions units P001, P002, P006-P009, P014, P015, and P024-P030, combined, shall not exceed 2.57 pounds per hour and 11.2 tons per year.
b.	OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		percent opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	The emission limitation based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The hourly and annual VOC and PE emission limitations above represent the emissions units' potentials to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with these emission limitations.

b. The emissions units shall be enclosed and vented through the roof.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the

emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

VOC emissions from emissions units P001, P002, P006-P009, P014, P015, and P024-P030, combined, shall not exceed 8.52 pounds per hour and 37.3 tons per year.

<u>Applicable Compliance Method:</u>

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation abovethrough emission testing performed in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore compliance with the annual limitation shall be demonstrated as long as compliance with the hourly limitation is maintained.

b. <u>Emission Limitation:</u>

PE from emissions units P001, P002, P006-P009, P014, P015, and P024-P030, combined, shall not exceed 2.57 pounds per hour and 11.2 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly PE limitation above through emission testing performed in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore compliance with the annual limitation shall be demonstrated as long as compliance with the hourly limitation is maintained.

c. Emission Limitation:

Visible PE from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Group 2: P003, P004, P005

EU ID	Operations, Property and/or Equipment Description
P003	1,500 gallon stainless steel reactor
P004	1,500 gallon stainless steel reactor
P005	1,500 gallon stainless steel reactor

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from emissions units P003-P005, combined, shall not exceed 3.68 pounds per hour and 16.1 tons per year. Particulate emissions (PE) from emissions units P003-P005, combined, shall not exceed 3.98 pounds per hour and 17.5 tons per year.
b.	OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(B)	The emission limitation based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The hourly and annual VOC and PE emission limitations above represent the emissions units' potentials to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with these emission limitations.

b. The emissions units shall be enclosed and vented through the roof.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

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

a. Emission Limitation:

VOC emissions from emissions units P003-P005, combined, shall not exceed 3.68 pounds per hour and 16.1 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation abovethrough emission testing performed in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore compliance with the annual limitation shall be demonstrated as long as compliance with the hourly limitation is maintained.

b. Emission Limitation:

PE from emissions units P003-P005, combined, shall not exceed 3.98 pounds per hour and 17.5 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly PE limitation above through emission testing performed in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore compliance with the annual limitation shall be demonstrated as long as compliance with the hourly limitation is maintained.

c. Emission Limitation:

Visible PE from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Group 3: P014, P015

EU ID	Operations, Property and/or Equipment Description
P014	2950 gallon fatty acid reactor
P015	2950 gallon fatty acid reactor

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions from emissions units P001, P002, P006-P009, P014, P015, and P024-P030, combined, shall not exceed 8.52 pounds per hour and 37.3 tons per year. Particulate emissions (PE) from emissions units P001, P002, P006-P009, P014, P015, and P024-P030, combined, shall not exceed 2.57 pounds per hour and 11.2 tons per year. See b)(2)b.
b.	OAC rule 3745-31-05 (A)(3), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-17-07(A)	Visible PE from the stack serving this emissions unit shall not exceed 20

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	The emission limitation based on this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The hourly and annual VOC and PE emission limitations above represent the emissions units' potential to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with these emission limitations.

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC and PE from P014 and P015 since the uncontrolled potentials to emit of VOC and PE from each source are less than 10 tons per year.

d. The emissions units shall be enclosed and vented through the roof.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

VOC emissions from emissions units P001, P002, P006-P009, P014, P015, and P024-P030, combined, shall not exceed 8.52 pounds per hour and 37.3 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation abovethrough emission testing performed in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore compliance with the annual limitation shall be demonstrated as long as compliance with the hourly limitation is maintained.

b. Emission Limitation:

PE from emissions units P001, P002, P006-P009, P014, P015, and P024-P030, combined, shall not exceed 2.57 pounds per hour and 11.2 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly PE limitation above through emission testing performed in accordance with Methods 1 - 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore compliance with the annual limitation shall be demonstrated as long as compliance with the hourly limitation is maintained.

c. Emission Limitation:

Visible PE from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group - Group 4: T002, T003, T010, T011, T012, T013, T014, T015, T016

EU ID	Operations, Property and/or Equipment Description
T002	13,000 gallon heated above ground storage tank
T003	8,000 gallon heated above ground storage tank
T010	10,000 gallon heated above ground storage tank
T011	10,000 gallon heated above ground storage tank
T012	10,000 gallon heated above ground storage tank
T013	10,000 gallon heated above ground storage tank
T014	10,000 gallon heated above ground storage tank
T015	13,000 gallon heated above ground storage tank
T016	7,500 gallon heated above ground storage tank (previously P013)

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from emissions units T002, T003, and T010-T020, combined, shall not exceed 0.35 pounds per hour and 1.5 tons per year.
b.	OAC rule 3745-21-09(L)	See b)(2)b.
c.	40 CFR Part 60, Subpart Kb	Exempt. See b)(2)c.

(2) Additional Terms and Conditions

a. The hourly and annual VOC emission limitations above represent the emissions units' potential to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with these emission limitations.

b. OAC rule 3745-21-09(L) is not applicable because this tank does not store petroleum liquids as defined in OAC rule 3745-21-01(E)(15), and the storage capacity is less than 40,000 gallons.

c. In accordance with 40 CFR 60.110b(a), each storage tank is exempt from the requirements of Subpart Kb because each tank has a capacity less than 75 m^3(19,815 gallons).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

VOC emissions from emissions units T002, T003, and T010-T020, combined, shall not exceed 0.35 pounds per hour and 1.5 tons per year.

<u>Applicable Compliance Method:</u>

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation abovethrough emission testing performed in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore compliance with the annual limitation shall be demonstrated as long as compliance with the hourly limitation is maintained.

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Group 5: T004,T005,T006,T007,T008,T009,

EU ID	Operations, Property and/or Equipment Description
T004	8,000 gallon heated above ground storage tank
T005	8,000 gallon heated above ground storage tank
T006	10,000 gallon heated above ground storage tank
T007	10,000 gallon heated above ground storage tank
T008	10,000 gallon heated above ground storage tank
T009	10,000 gallon heated above ground storage tank

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions from emissions units T004-T009, combined, shall not exceed 2.32 pounds per hour and 10.2 tons per year.
b.	OAC rule 3745-21-09(L)	See b)(2)b.
c.	40 CFR Part 60, Subpart Kb	Exempt. See b)(2)c.

(2) Additional Terms and Conditions

a. The hourly and annual VOC emission limitations above represent the emissions units' potential to emit. Therefore, no monitoring, record keeping, and/or reporting

requirements are necessary to ensure compliance with these emission limitations.

b. OAC rule 3745-21-09(L) is not applicable because this tank does not store petroleum liquids as defined in OAC rule 3745-21-01(E)(15), and the storage capacity is less than 40,000 gallons.

c. In accordance with 40 CFR 60.110b(a), each storage tank is exempt from the requirements of Subpart Kb because each tank has a capacity less than 75 m^3(19,815 gallons).

c) Operational Restrictions

(1) All loading operations performed at the emissions units shall employ submerged or bottom fill.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

VOC emissions from emissions units T004-T009, combined, shall not exceed 2.32 pounds per hour and 10.2 tons per year.

<u>Applicable Compliance Method:</u>

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation abovethrough emission testing performed in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore compliance with the annual limitation shall be demonstrated as long as compliance with the hourly limitation is maintained.

g) Miscellaneous Requirements

(1) None.