



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

9/1/2015

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: P0119193  
 Permit Type: Initial Installation  
 County: Summit

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

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](http://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](mailto:HClerk@epa.ohio.gov)

### Draft Air Pollution Permit-to-Install and Operate Initial Installation STRUKTOL COMPANY

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

ID#:P0119193

Date of Action: 9/1/2015

Permit Desc:Initial installation PTIO for existing sources at a chemical preparations facility..

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:	P0119193
Permit Type:	Initial Installation
Issued:	9/1/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





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

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**Draft Permit-to-Install and Operate**

STRUKTOL COMPANY

**Permit Number:** P0119193

**Facility ID:** 1677000120

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1677000120  
Application Number(s): A0053612  
Permit Number: P0119193  
Permit Description: Initial installation PTIO for existing sources at a chemical preparations facility.  
Permit Type: Initial Installation  
Permit Fee: \$7,600.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 9/1/2015  
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: P0119193  
 Permit Description: Initial installation PTIO for existing sources at a chemical preparations facility.

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

**Emissions Unit ID: P023**  
 Company Equipment ID: Rotoformer 23  
 Superseded Permit Number:  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: P025**  
 Company Equipment ID: Reactor 25  
 Superseded Permit Number:  
 General Permit Category and Type: Not Applicable

**Group Name: Group 1**

<b>Emissions Unit ID:</b>	<b>P016</b>
Company Equipment ID:	Rotoformer 16
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P017</b>
Company Equipment ID:	Rotoformer 17
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Group 2**

<b>Emissions Unit ID:</b>	<b>P018</b>
Company Equipment ID:	Fatty acid rotoform 18
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P019</b>
Company Equipment ID:	Rotoformer 19
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P020</b>
Company Equipment ID:	Rotoformer 20
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P021</b>
Company Equipment ID:	Rotoformer 21
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P022</b>
Company Equipment ID:	Rotoformer 22
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Group 3**



**Draft Permit-to-Install and Operate**

STRUKTOL COMPANY

Permit Number: P0119193

Facility ID: 1677000120

Effective Date: To be entered upon final issuance

<b>Emissions Unit ID:</b>	<b>P024</b>
Company Equipment ID:	Reactor 24
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P026</b>
Company Equipment ID:	Reactor 26
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P027</b>
Company Equipment ID:	Reactor 27
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P028</b>
Company Equipment ID:	Reactor 28
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P029</b>
Company Equipment ID:	Reactor 29
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P030</b>
Company Equipment ID:	Reactor 30
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Group 4**

<b>Emissions Unit ID:</b>	<b>T017</b>
Company Equipment ID:	Tank 17
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T018</b>
Company Equipment ID:	Tank 18
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T019</b>
Company Equipment ID:	Tank 19
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T020</b>
Company Equipment ID:	Tank 20
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
STRUKTOL COMPANY  
**Permit Number:** P0119193  
**Facility ID:** 1677000120  
**Effective Date:** To be entered upon final issuance

## **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 being permanently shut down without first applying for and obtaining a permit pursuant to 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.



**Draft Permit-to-Install and Operate**  
STRUKTOL COMPANY  
**Permit Number:** P0119193  
**Facility ID:** 1677000120  
**Effective Date:** To be entered upon final issuance

## **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.



**Draft Permit-to-Install and Operate**  
STRUKTOL COMPANY  
**Permit Number:** P0119193  
**Facility ID:** 1677000120  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. P023, Rotoformer**

**Operations, Property and/or Equipment Description:**

Fatty-acid based product rotoformpastillation system.

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) June 30, 2008	<p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 0.01 ton per month (averaged over a rolling, 12-month period).</p> <p>Particulate emissions (PE) from this emissions units shall not exceed 0.02 ton/month (averaged over a rolling, 12-month period)</p> <p>See b)(2)b.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	<p>The Best Available Technology Requirements (BAT) under OAC rule 3745-31-05(A)(3) do not apply to the VOC and PE emissions from P023 since the potentials to emit are less than 10 tons/year.</p> <p>See b)(2)c.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	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.
d.	OAC rule 3745-17-11(B)	PE shall not exceed 10.72 lbs PE/hr (based on a process weight of 8400 lbs/hr)

(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. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

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 this emissions unit shall not exceed 0.01 ton per month (averaged over a rolling, 12-month period).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly emission limitation by multiplying the maximum hourly mass emission rate (0.03 lb/hr) by 8760 hours per year, and then dividing by 2000 and by 12. .
  - b. Emission Limitation:

PE from this emissions unit shall not exceed 0.02 ton per month (averaged over a rolling, 12-month period).



Applicable Compliance Method:

The permittee shall demonstrate compliance with the monthly emission limitation by multiplying the maximum hourly mass emission rate (0.046 lb/hr) by 8760 hours per year, and then dividing by 2000 and by 12. .

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.

d. Emission Limitation:

PE shall not exceed 10.72 lbs/hr.

Applicable Compliance Method:

If required, compliance with the hourly PE limitation above shall be demonstrated based on the results of emission testing conducted in accordance with OC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

- (1) None.



**2. P025, Reactor**

**Operations, Property and/or Equipment Description:**

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), as effective 11/30/01	<p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.49 tons per year.</p> <p>Particulate emissions (PE) from this emissions unit shall not exceed 0.75 ton per year.</p> <p>See b)(2)b.</p>
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 percent opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	PE shall not exceed 10.72 lbs PE/hr (based on a maximum process weight rate of 8400 lbs/hr)

(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 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 P025 since the uncontrolled potentials to emit of VOC and PE 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. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 2.49 tons per year.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual emission limitation by multiplying the maximum hourly mass emissions (0.568 lb/hr) by 8760 hours per year, and then dividing by 2000.

Emission Limitation:

PE from this emissions unit shall not exceed 0.7 ton per year.



Applicable Compliance Method:

The permittee shall demonstrate compliance with annual emission limitation by multiplying the maximum hourly mass emissions (0.171 lb/hr) by 8760 hours per year, and then dividing by 2000.

b. Emission Limitation:

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

Applicable Compliance Method:

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

c. Emission Limitation:

PE shall not exceed 10.72 lbs/hr.

Applicable Compliance Method:

If required, compliance with the hourly PE limitation above shall be demonstrated based on the results of emission testing conducted in accordance with OC rule 3745-17-03(B)(10).

g) Miscellaneous Requirements

(1) None.

**3. Emissions Unit Group - Group 1: P016, P017**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P016	Product rotoformpastillation system
P017	Product rotoformpastillation system

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 0.10 pounds per hour and 0.45 tons per year.</p> <p>Particulate emissions (PE) shall not exceed 0.13 pounds per hour and 0.56 tons per year.</p>
b.	OAC rule 3745-17-07(A)	Visible particulate emissions 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' potential to emit. Therefore, no monitoring, record keeping, and/or reporting requirements are necessary to ensure compliance with these emission limitations.

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 shall not exceed 0.10 pounds per hour and 0.45 tons per year.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation above through 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 shall not exceed 0.13 pounds per hour and 0.56 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 particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.



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**Effective Date:** To be entered upon final issuance

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.



**4. Emissions Unit Group - Group 2: P018, P019, P020, P021, P022**

EU ID	Operations, Property and/or Equipment Description
P018	Fatty-acid based product rotoformpastillation system
P019	Fatty-acid based product rotoformpastillation system
P020	Fatty-acid based product rotoformpastillation system
P021	Fatty-acid based product rotoformpastillation system.
P022	Fatty-acid based product rotoformpastillation system.

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 P018-P023, combined, shall not exceed 0.15 pounds per hour and 0.65 tons per year.  Particulate emissions (PE) from emissions units P018-P023, combined, shall not exceed 0.23 pounds per hour and 0.99 tons per year.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions 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



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		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.

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 P018-P023, combined, shall not exceed 0.15 pound per hour and 0.65 ton per year.

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation above through 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 P018-P023, combined, shall not exceed 0.23 pounds per hour and 0.99 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.



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c. Emission Limitation:

Visible particulate emissions 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.



**5. Emissions Unit Group -Group 3: P024,P026,P027,P028,P029,P030,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P024	1,500 gallon fatty acid reactor
P026	1,500 gallon fatty acid reactor
P027	1,500 gallon fatty acid reactor
P028	1,500 gallon fatty acid reactor
P029	1,500 gallon fatty acid reactor
P030	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)	<p>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.</p> <p>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.</p>
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		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' potential 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 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 above through 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 particulate emissions 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.

**6. Emissions Unit Group -Group 4: T017,T018,T019,T020,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
T017	13,000 gallon heated above ground storage tank
T018	10,000 gallon above ground storage tank
T019	10,500 gallon above ground storage tank
T020	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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
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<sup>3</sup>(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. Emission Limitation:

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.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation above through 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.