



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

10/2/2015

Ms. ROBYN SIGLER
 Arclin USA, LLC
 6175 AMERICAN RD.
 TOLEDO, OH 43612

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

Facility ID: 0448011550
 Permit Number: P0119452
 Permit Type: Initial Installation
 County: Lucas

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, Toledo Blade. 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 Toledo Department of Environmental Services
 348 South Erie Street
 Toledo, OH 43604

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 Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
 TDES; Michigan; Indiana; Canada

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Arclin USA is a specialty chemicals company that produces a diverse range of resins and formaldehyde. These resins are urea-formaldehyde resins and phenol-formaldehyde resins. The facility is located at 6175 American Road, Toledo, Ohio 43612 in Lucas County. The facility operates two resin manufacturing processes (P001, P002) and a formaldehyde manufacturing plant (P003) with associated bulk material handling, storage tanks, and a loading facility.

Arclin proposes to install a new, larger blower in the formaldehyde manufacturing plant which will result in an increase in potential formaldehyde production to 180,000,000 pounds of 37% formaldehyde per year. In addition, raw material methanol throughput will increase at the methanol tank (T059) and piping components will be added which will increase fugitive emissions from the total plant fugitive emissions/LDAR program (P801).

An initial operating permit will be issued for the existing formaldehyde loading facility (J001) and the facility has applied for a permit by rule for an existing emergency diesel generator (P005) and an existing emergency diesel air compressor (P006).

Arclin has requested a federally enforceable permit to install/permit to operate (FEPTIO) for HAPs emissions to avoid potential Title V permit applicability.

3. Facility Emissions and Attainment Status:

This facility is currently a minor source of HAP emissions and a minor source for all criteria pollutants. After issuance of this permit, this permit will formalize Arclin's status as a minor source of all pollutants with the potential to emit 12.69 tons per year as combined HAPs and 13.34 tons per year as VOC.

Facility-wide individual HAPs are restricted to 9.9 tons per year and facility-wide combined HAPs emissions are restricted to 24.9 tons per year. These federally enforceable restrictions allow Arclin to remain a minor source for PSD and Title V purposes.

Lucas County is classified as attainment for all criteria pollutants.

4. Source Emissions:

Facility-wide potential emissions are as follows:

EU Id	Individual Emissions									Permit Allowable Facility-wide limitations	
	Formaldehyde tpy	Phenol tpy	Methanol tpy	PE tpy	PM10 tpy	CO tpy	NOx tpy	SO2 tpy	VOC tpy	Individual HAP, tpy	Combined HAPs, tpy
B001 Boiler #1	1.93E-03			0.20	0.20	2.16	2.58	0.02	0.14	9.9	24.9
B002 Boiler #2	1.93E-03			0.20	0.20	2.16	2.58	0.02	0.14		
J001 Formaldehyde loading	0.66 (+0.01)*		0.35 (+0.01)*						1.01 (+0.01)*		
P001 Kettle #1	0.60	0.10	0.10						0.96		
P002 Kettle #2	0.60	0.10	0.10						0.96		
P003 Hyde Mfg	2.39 (+0.85)		1.46 (+0.52)			63.04 (+22.53)			3.84 (+3.36)		
P005 Emerg. engine	0.03 (+0.03)*			0.06 (+0.06)*	0.06 (+0.06)*	0.17 (+0.17)*	0.78 (+0.78)*	0.05 (+0.05)*	0.06 (+0.06)*		
P006 Emerg. engine	0.03 (+0.03)*			0.06 (+0.06)*	0.06 (+0.06)*	0.17 (+0.17)*	0.78 (+0.78)*	0.05 (+0.05)*	0.06 (+0.06)*		
P801 Fug. VOC/LDAR	0.19 (+0.00018)	3.29	2.11						5.59 (+0.00018)		
P901 Bulk Mat'l handling				9.03	4.27						
T059 #19 meth. storage			0.20 (+0.1357)						0.20 (+0.1357)		
Exempt tanks	0.31	0.07							0.38		
Totals	4.81386	3.56	4.32	9.55	4.79	67.7	6.72	0.14	13.34		
Increase	0.92018	0.0	0.6657	0.12	0.12	22.87	1.56	0.1	3.62588		
Increase due to P003 expansion	0.85018	0.0	0.6557	0.0	0.0	22.53	0.0	0.0	3.49588		

*J001, P005, and P006 are shown with emissions increases. The increases are because these existing emissions units have never been permitted. According to the permit application, only J001, P801, P003, and T059 have an actual increase in emissions due to the formaldehyde plant expansion.

5. Conclusion:

This permit should be issued draft to make the synthetic minor facility-wide limitations federally enforceable.

6. Please provide additional notes or comments as necessary:

The Arclin permit application addresses the following:

- An administrative modification to remove the emission-unit specific individual HAP emissions limits in the permit to be replaced by the facility-wide VOC and HAP emissions limits.
- An administrative modification to remove the use of maleic anhydride from kettle #1 (P001) and in the bulk material handling (P901) because the changes to produce a maleic anhydride-based resin in P001 (as permitted under P0107985, issued 4/29/2011) were never made.
- An administrative modification to remove scrubber monitoring, record-keeping, and reporting requirements from kettle #1 (P001) and kettle #2 (P002) because the scrubber was added as a particulate pollution control device for P001, when the facility thought it was going to start producing maleic anhydride resins. The scrubber is no longer needed since the maleic anhydride was never used.
- An initial permit for an existing emergency electrical generator (P005) and an existing diesel air compressor (P006) to formalize GACT requirements in a traditional permit.
- An initial permit which is also an administrative modification to account for the additional throughput from the formaldehyde plant expansion for the existing formaldehyde loading facility (J001).

TES has reviewed each of these points and has determined the following:

- Source-specific VOC emissions limits cannot be removed and replaced with a facility-wide VOC limit. The sources at this facility were installed after 1974 and are subject to BAT. Therefore, a BAT for VOC emissions must be established for each source. The facility has agreed they will not request a facility-wide VOC limit. A facility-wide HAPs emission limitation can be administratively established in place of individual source-specific HAPs emissions limits.
- By this permit action, the maleic anhydride emissions will be removed from kettle #1 (P001) and will not be handled in P901(as permitted under P0107985, issued 4/29/2011) because the changes to produce a maleic anhydride based resin in P001 were never made.
- P001 and P002 are controlled by scrubbers and the facility requests the terms be removed from these permits. P001 and P002 are vented to a wet scrubber followed by a common catalytic incinerator. The files indicate that when the scrubbers were first installed, it was indicated that the scrubbers just controlled salts to prevent contamination of the catalytic incinerator catalyst, so this office did not require Arclin to modify the permits for P001 and P002 to include wet scrubber terms. When the facility applied to produce the maleic anhydride-based resin in P001, it was expected that the wet scrubber would reduce VOC emissions prior to the catalytic incinerator. The scrubbers were considered add-on air pollution control equipment and the wet scrubber would assist the permittee with compliance with the 98% VOC control requirement if the emissions are greater than 20 ppm VOC. Ohio EPA has determined that the scrubber terms can be removed because the scrubber does not control VOC emissions. The processes are not subject to particulate regulations. Additionally, if the scrubber is taken off line while the process is still running, it will not result in an emissions violation. Therefore, Ohio EPA agrees the scrubber terms and can be removed from the permit.
- The facility has applied for a permit by rule for the two emergency engines. The facility initially applied for a traditional permit to formalize the GACT terms in a permit. However, the OEPA has

not accepted authority over the GACT and current permit writing policies do not allow for the addition of GACT terms to permits.

Additionally, TES reviewed the following:

- The applicability of OAC rule 3745-21-09(EE) to the two resin kettles (P001, P002). The facility has confirmed that these kettles are not air oxidation processes. As a result, by this permit action all terms and conditions related to OAC rule 3745-21-09(EE) will be removed from P001 and P002. Because OAC rule 3745-21-09(DD) applies to these emissions units, the terms for OAC rule 3745-21-09(DD) will remain in the permit. These rules are still applicable to the formaldehyde plant (P003). When it was determined that OAC rule 3745-21-09(EE) did not apply to P001 and P002, TES asked Arclin whether they want to request federal enforceability for the catalytic incinerator. With federal enforceability, the facility can take credit for the controls when calculating PTE for Title V applicability. The facility has requested federally enforceable controls requirements for the resin kettles (P001, P002).
- The modifications to equipment leaks/LDAR program (P801) do not trigger the applicability of 40 CFR 60, Subpart VVa. The facility has indicated that under the formaldehyde plant expansion only a handful of flanges and valves are being replaced and a capital expenditure under 40 CFR 60.481 did not occur. The applicable terms for 40 CFR 60, Subpart VV will remain in the permit.

Chapter 31 Modification

OAC rule 3745-31-01(SSS)(1)(a)(i) 'Modify' or 'modification' means Any physical change in, or change in the method of operation of any air contaminant source that results in an increase in the allowable emissions.

OAC rule 3745-31-01(SSS)(1)(a)(vii) 'Modify' or 'modification' shall not include allowable emission increases due to an alternative emission limit that satisfies the criteria set forth in division (E) of section 3704.03 of the Revised Code and is consistent with division (K) of section 3704.036 of the Revised Code.

The changes to P003 and P801 will be handled as a Chapter 31 modification.

Administrative Modification

The changes to P001, P002, and T059 will be handled as an administrative modification. T059 has always been able to handle the proposed throughput.

Initial Operating Permit

The facility has applied for initial operating permits for three existing, unpermitted sources: a formaldehyde loading facility (J001), an emergency diesel generator (P005), and an emergency diesel air compressor (P006). The emergency diesel generator and emergency diesel air compressor qualify for a permit by rule and will be permitted as such. This permit action is an initial operating permit for the existing J001. The loading rack is not undergoing any physical changes due to the formaldehyde plant expansion and it has always been able to handle the throughput identified in the permit application. The current throughput will be increased due to the plant expansion but will not exceed what the loading rack has always been capable of accommodating. It is appropriate to classify the initial FEPTIO for the formaldehyde loading facility as an initial installation.

At the facility's request, these permit actions will be processed under one permit.

BAT Determination

P003, and P801 trigger Chapter 31 modifications and BAT will be determined based on the February 7, 2014 interoffice memorandum which supersedes the *BAT Requirements for Permit Applications Filed on or After August 3, 2009* interoffice memorandums dated August 30, 2013 and December 10, 2009, issued after the February 2, 2010 U.S. District Court for the Southern District of Ohio ruling in *Sierra Club v. Christopher Korleski, Director of Ohio EPA*; a court decision which does not recognize the less than 10 tpy BAT exemption. This memorandum addresses permit processing after the U.S. District Court <10 tpy exemption decision.

Based on the "Table Describing BAT Applicability" contained in the 2/7/2014 memo *BAT Requirements for Permits Issued On or After February 7, 2014*, P003, P801, and T059 are subject to the requirements contained in the February 7, 2014 BAT Guidance.

Under the February 7, 2014 BAT Guidance:

- BAT could not be established for < 10 ton/yr sources
- Detailed guidance on >10 tpy sources: MACT, BACT, LAER
- BAT expressed in one of 4 ways
- Follow format of BAT expression table
- RACT=BAT floor NOx and VOC
- No BAT for PALs

P003

The formaldehyde plant is being modified to install a new, larger blower which will increase maximum production to 180,000,000 pounds of 37% formaldehyde per year. Uncontrolled potential emissions of VOCs are less than 10 tpy. Uncontrolled potential emissions of CO are greater than 10 tpy.

CO Emissions

ORC 3704.03(T) - BAT requirements for emissions units with emissions \geq 10 tons/yr. Since there is no applicable RACT rule for CO emissions, and there are no applicable MACT/GACT/BACT/LAER requirements that apply, a case-by-case BAT determination needs to be made.

TES conducted a search of Ohio EPA's online "Electronic Copies of Issued Permits" using the search string of: formaldehyde plant. Summarized below are results for formaldehyde plants contained in the search results, and review of the associated permit terms and conditions.

Permit/Facility Name	Emissions Unit Description	BAT
P0113412 issued 5/7/2014 Capital Resin Corp Renewal	Process: Formaldehyde/Urea Formaldehyde Concentrate Manufacturing Plant	4.05 lb/hr and 17.07 tpy CO emissions; incinerator with 98% control efficiency at the maximum methanol feed rate and compliance with the requirements of OAC rule 3745-21-09(EF).
P0114993 issued 9/9/2013 Georgia Pacific Chemicals LLC Administrative Modification	P001: Plant No. 1 metal oxide process for formaldehyde and urea-formaldehyde production	31-05(D) only – equipment installed in 1970

P0112344 issued 12/31/2012 Georgia Pacific Chemicals LLC Administrative Modification	Plant No. 2 metal oxide process for formaldehyde and urea-formaldehyde production vented to a catalytic incinerator	31-05(D) only – equipment installed in 1978
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It appears that based on the information contained in the above table, Ohio formaldehyde plant permits have set a short term and annual CO limitation. The requested allowable CO emissions in this permit P0116983 are less than 80 tons/yr CO, so Ohio EPA policy indicates that a formal BAT study is not required. Per the facility's request, for federal enforceability, BAT for this emissions unit will be a CO emissions limit expressed as pounds per hour and tons per year CO.

VOC Emissions

40 CFR 60, Subpart III is more stringent than OAC rule 3745-21-09(EE) for organic compound emissions. These NSPS standards will be used to establish BAT for this emissions unit.

P801

Additional valves and flanges will be added to accommodate the formaldehyde plant expansion. The leaks from the additional valves and flanges will increase total plant fugitive VOC emissions/LDAR program (P801). Uncontrolled potential emissions of VOCs are less than 10 tpy. The emissions unit is subject to the RACT requirements of OAC rule 3745-21-09(DD) and the NSPS requirements of 40 CFR 60, Subpart VV. The facility has requested that BAT be established as compliance with the applicable leak monitoring and repair requirements of 40 CFR 60, Subpart VV, OAC rule 3745-21-09(DD), and the practices and procedures implemented at the facility to identify leaks. The permittee has indicated that they do not trigger a modification due to the small number of equipment being added that is subject to NSPS VV and they have not triggered a capital expenditure.

J001

J001 is a formaldehyde loading rack. The load rack has one bay and tank trucks are loaded with top load, splash fill. The maximum throughput after the Formaldehyde Plant expansion will be 3,100,000 gallons per year. The load rack is vented to the Resin Plant catalytic incinerator. The load rack was installed in January, 2009 and this is an initial permit to operate. The loading rack capacity is not changed by the formaldehyde plant expansion but emissions will increase to accommodate the additional formaldehyde. Uncontrolled potential emissions are <10 tpy.

This will be processed as an initial installation and BAT will be determined based on the February 7, 2014 interoffice memorandum which supersedes the *BAT Requirements for Permit Applications Filed on or After August 3, 2009* interoffice memorandums dated August 30, 2013 and December 10, 2009, issued after the February 2, 2010 U.S. District Court for the Southern District of Ohio ruling in *Sierra Club v. Christopher Korleski, Director of Ohio EPA*; a court decision which does not recognize the less than 10 tpy BAT exemption. This memorandum addresses permit processing after the U.S. District Court <10 tpy exemption decision.

Based on the "Table Describing BAT Applicability" contained in the 2/7/2014 memo *BAT Requirements for Permits Issued On or After February 7, 2014*, J001 is subject to the requirements contained in the March, 2008 BAT Guidance.

Under the March 2008 BAT Guidance:

- BAT could not be established for < 10 ton/yr sources

- No BAT listed for sources <10 tpy

The facility has requested that BAT be established as a pound per hour and a ton per year.

Applicable Rules

J001

OAC rule 3745-31-05(A)(3)(b), following the March, 2008 guidance - BAT requirements for emissions units having potential emissions of less than 10 tons/yr.

OAC rule 3745-31-05(D) - Synthetic minor limitation on potential to emit to restrict HAPs emissions to less than major source thresholds to avoid PSD, Title V, and MACT.

P001, P002

OAC rule 3745-31-05(A)(3) – as established under PTI 04-01445.

Since this is an Administrative Modification, Senate Bill 265 does not apply to this permit.

VOC: 0.22 lb/hr and 0.96 ton per year

OAC rule 3745-31-05(D)

Synthetic minor limitation on potential to emit to restrict HAPs emissions to less than major source thresholds to avoid PSD, Title V, and MACT

P003

ORC 3704.03(T) - BAT requirements for emissions units with emissions ≥ 10 tons/yr

OAC rule 3745-31-05(A)(3), following the February 7, 2014 guidance - BAT requirements for emissions units having potential emissions of less than 10 tons/yr.

OAC rule 3745-31-05(A)(3)(a)(ii), following the February 7, 2014 guidance - BAT requirements for emissions units having potential emissions of less than 10 tons/yr.

OAC rule 3745-31-05(D) - Synthetic minor limitation on potential to emit to restrict HAPs emissions to less than major source thresholds to avoid PSD, Title V, and MACT.

OAC rule 3745-21-09(DD)

A leak detection and repair program is required for equipment leaks. The facility-wide leak detection and repair program requirements are contained in P801.

OAC rule 3745-21-09(EE)

The catalytic incinerator shall be designed and operated to: (1) reduce emissions of total organic compounds (less methane and ethane) with an efficiency of at least 98%, by weight; or (2) emit VOC at a concentration less than 20 parts per million by volume, dry basis.

The catalyst viability terms and conditions are being added to the permit due to problems with meeting the 80% temperature differential requirement at the incinerator.

40 CFR Part 60, Subpart VV

A leak detection and repair program is required for equipment leaks. The facility-wide leak detection and repair program requirements are contained in P801,

40 CFR Part 60, Subpart III

The permittee shall control emissions of total organic compounds (TOC) (less methane and ethane) by 98 weight percent or to a TOC (less methane and ethane) concentration of 20 ppm by volume, on a dry basis corrected to 3% oxygen, whichever is less stringent.

P801

OAC rule 3745-31-05(A)(3), following the February 7, 2014 guidance - BAT requirements for emissions units having potential emissions of less than 10 tons/yr.

OAC rule 3745-31-05(A)(3)(a)(ii), following the February 7, 2014 guidance - BAT requirements for emissions units having potential emissions of less than 10 tons/yr.

OAC rule 3745-31-05(D) - Synthetic minor limitation on potential to emit to restrict HAPs emissions to less than major source thresholds to avoid PSD, Title V, and MACT.

OAC rule 3745-21-09(DD)

A leak detection and repair program is required for equipment leaks. The facility-wide leak detection and repair program requirements are contained in P801.

40 CFR Part 60, Subpart VV

A leak detection and repair program is required for equipment leaks. The facility-wide leak detection and repair program requirements are contained in P801.

T059

OAC rule 3745-31-05(A)(3), as established under P0088404. Since this is an Administrative Modification, Senate Bill 265 does not apply to this permit.

VOC: 1.8 tons per year

OAC rule 3745-31-05(D) - Synthetic minor limitation on potential to emit to restrict HAPs emissions to less than major source thresholds to avoid PSD, Title V, and MACT.

NSPS Subpart Kb - Internal floating roof requirements for the storage of volatile organic liquids

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	67.7 (22.87 increase)
PE	9.55 (0.12 increase)
PM10	4.79 (0.12 increase)



Permit Strategy Write-Up
Arclin USA, LLC
Permit Number: P0119452
Facility ID: 0448011550

NOx	6.72 (1.56 increase)
SO2	0.14 (0.1 increase)
VOC	13.34 (3.62588 increase)
HAPs (Facility-wide)	9.9 (individual)
HAPs (Facility-wide)	24.9 (combined)

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 Initial Installation
Arclin USA, LLC

6175 AMERICAN RD., Toledo, OH 43612

ID#:P0119452

Date of Action: 10/2/2015

Permit Desc:Formaldehyde plant expansion.

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: Kurt Bezeau, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Arclin USA, LLC**

Facility ID:	0448011550
Permit Number:	P0119452
Permit Type:	Initial Installation
Issued:	10/2/2015
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
Arclin USA, LLC

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Draft Permit-to-Install and Operate

Arclin USA, LLC

Permit Number: P0119452

Facility ID: 0448011550

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448011550
Application Number(s): A0053110, A0054037
Permit Number: P0119452
Permit Description: Formaldehyde plant expansion
Permit Type: Initial Installation
Permit Fee: \$1,125.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 10/2/2015
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:

Arclin USA, LLC
6175 AMERICAN RD.
Toledo, OH 43612

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:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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: P0119452

Permit Description: Formaldehyde plant expansion

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

Emissions Unit ID:	J001
Company Equipment ID:	TF Loading
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	TF-1
Superseded Permit Number:	P0088404
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P801
Company Equipment ID:	Leak Detection and Repair
Superseded Permit Number:	P0088404
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	T059
Company Equipment ID:	METHANOL TANK T-METH-2
Superseded Permit Number:	P0088404
General Permit Category and Type:	Not Applicable

Group Name: resin kettles

Emissions Unit ID:	P001
Company Equipment ID:	Kettle One
Superseded Permit Number:	P0107985
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Kettle Two
Superseded Permit Number:	P0107985
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

Arclin USA, LLC

Permit Number: P0119452

Facility ID: 0448011550

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 Toledo Department of Environmental Services 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

Arclin USA, LLC

Permit Number: P0119452

Facility ID: 0448011550

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) B.2.
2. The facility-wide hazardous air pollutant (HAP) emissions, as identified in Section 112(b) of Title III of the Clean Air Act, including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, shall not exceed 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAP.
 - a) The permittee shall maintain monthly records of the following information for the entire facility:
 - (1) the individual HAP emissions, in tons;
 - (2) the combined HAP emissions, in tons;
 - (3) the individual HAP emissions, in tons per rolling, 12-month period; and
 - (4) the combined HAP emissions, in tons per rolling, 12-month period.
 - b) HAP Deviation Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

Facility-wide HAP emissions shall not exceed 9.9 tons per rolling, 12-month period of any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAP;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) 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.
 - a. The permittee shall identify in the annual PER any deviations from HAP emissions limitation specified in B.2.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Toledo Division of Environmental Services, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Draft Permit-to-Install and Operate

Arclin USA, LLC

Permit Number: P0119452

Facility ID: 0448011550

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. J001, Formaldehyde Loading

Operations, Property and/or Equipment Description:

Formaldehyde loading operations with catalytic incinerator.

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. b)(1)c., d)(1), e)(2), f)(1)b. and f)(1)c.

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 0.23 pound per hour and 1.01 tons per year.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)b.
c.	OAC rule 3745-31-05(D) June 30, 2008 (Federally enforceable limitation to avoid Title V and MACT)	<p>Facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 9.9 tons individual, or 24.9 tons of any combination of HAPs per rolling, 12-month period.</p> <p>See b)(2)c. through b)(2)g.</p>

(2) Additional Terms and Conditions

- a. 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).
- b. 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. A means shall be provided to capture and contain drainage of formaldehyde product from the loading device when it is not in use.
- d. The catalytic incinerator requirements applicable to this emissions unit is subsumed into the terms for emissions units P001 and P002.
- e. All vapors displaced or emitted from this emissions unit during product transfer shall be vented to the vapor collection system that shall meet the operational, monitoring and record keeping requirements of this permit, when the emission unit is in operation.
- f. The permittee shall prevent the unintentional release of formaldehyde, which could result in evaporation.
- g. The annual HAP emission limitations were established with additional recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions to ensure compliance with these limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Each calendar month, the permittee shall inspect the vapor and liquid lines during the loading of crude oil into tank trucks for liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. If leaks are detected, the permittee shall maintain a record of the following information:
 - a. the date the leak was detected;
 - b. the findings of the inspection for the leak, which shall indicate the location, nature, and severity of the leak;
 - c. the leak detection method;
 - d. the corrective action(s) taken to repair each leak and the date of final repair;
 - e. the reasons for any repair interval exceeding 15 calendar days (from the time of detection to the date of final repair) for each leak; and

- f. the inspector's name and signature.

These records shall be retained and accessible for a period of 5 years.

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 :
 - a. identification of any leaks in the liquid or vapor lines that were not repaired within 15 calendar days of detection.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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 0.23 pound per hour and 1.01 tons per year.

Applicable compliance method:

Compliance with the short term and long term VOC limitation is ensured by adhering to the control equipment standards stated in b)(2)c. through b)(2)f. and the monitoring and recordkeeping requirements specified in d)(1).



b. Emission limitation:

9.9 tons per rolling 12-month period for any individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

c. Emission limitation:

24.9 tons per rolling 12-month period combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

g) Miscellaneous Requirements

(1) None.

2. P003, TF-1

Operations, Property and/or Equipment Description:

Formaldehyde manufacturing plant with catalytic incinerator

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. b)(1)d. and f)(1)c. and f)(1)d.

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.	ORC 3704.03(T)	Carbon monoxide (CO) emissions shall not exceed 14.39 pounds per hour and 63.04 tons per year. See b)(2)i
b.	OAC rule 3745-31-05(A)(3) June 30, 2008 (Chapter 31 Modification)	All emissions shall vent to a catalytic incinerator that is designed and operated to reduce emissions of total organic compounds (TOC) (less methane & ethane) by 98 weight percent or to a TOC (minus methane and ethane) concentration of 20 ppm by volume, on a dry basis corrected to 3 percent oxygen, whichever is less stringent. See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(D) June 30, 2008 (Federally enforceable limitation to avoid Title V and MACT)	Facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 9.9 tons individual, or 24.9 tons of any combination of HAPs per rolling, 12-month period. See b)(2)c.
e.	OAC rule 3745-21-09(DD)	See b)(2)d.
f.	OAC rule 3745-21-09(EE)	See b)(2)e.
g.	40 CFR Part 60 Subpart A [40 CFR 60.1-60.19]	see b)(2)f.
h.	40 CFR Part 60 Subpart VV [In accordance with 40 CFR 60.480, this emissions unit contains equipment in the synthetic organic chemicals manufacturing industry installed or modified after 1/5/1981 and on or before 11/7/2006 and is subject to the emissions limitations /control requirements specified in this section.]	see b)(2)g.
i.	40 CFR Part 60 Subpart III [In accordance with 40 CFR 60.610, this emissions unit is an air oxidation unit not discharging its vent stream into a recovery system having a TRE index value less than or equal to 4.0 and subject to the emissions limitations/control requirements specified in this section.]	see b)(2)h.

(2) Additional Terms and Conditions

- a. 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.

b)(1)b.

- b. 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.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled volatile organic compound (VOC) emissions from this air contaminant source since the potential to emit for VOC is less than ten tons per year taking into account the federally enforceable rule limit of 98% emission reduction under OAC rule 3745-21-09(EE).

- c. The annual HAP emission limitations were established with additional recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions to ensure compliance with these limitations.
- d. The permittee shall comply with all applicable requirements of OAC rule 3745-21-09(DD). The terms and conditions associated with this rule are contained in emissions unit P801 (Fugitive Emissions).
- e. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60, Subpart III.
- f. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- g. The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart VV. The terms and conditions associated with this rule are contained in emissions unit P801 (Fugitive Emissions).
- h. The permittee shall vent all emissions to a catalytic incinerator that is designed and operated to reduce emissions of total organic compounds (TOC) (less methane & ethane) by 98 weight percent or to a TOC (minus methane and ethane) concentration of 20 ppm by volume, on a dry basis corrected to 3 percent oxygen, whichever is less stringent.
- i. The annual CO emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

- (1) The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance. The average temperature

difference across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

d) **Monitoring and/or Recordkeeping Requirements**

(1) The permittee shall operate and maintain a temperature monitoring device equipped with a continuous recorder and having an accuracy of ± 1 percent of the temperature being monitored expressed in degrees Celsius or ± 0.5 °C, whichever is greater. The temperature monitoring devices shall be installed in the gas stream immediately upstream and downstream of the incinerator's catalyst bed. Units shall be in degrees Fahrenheit. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day:

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance;
- b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80% of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
- c. A log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

(2) The permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of vent stream flow to the incinerator at least once every hour. The flow indicator shall be installed in the vent stream at a point closest to the inlet of each incinerator and before being joined with any other vent stream.

e) **Reporting Requirements**

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most

recent performance test that demonstrated the emissions unit(s) was/were in compliance;

- ii. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference established during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
- iii. any records of downtime (date and length of time) for the capture (collection) system, the catalytic incinerator, and/or the monitoring equipment when the emissions unit(s) was/were in operation;
- iv. a log of the operating time for the capture system, catalytic incinerator, monitoring equipment, and the emissions unit(s); and
- v. all periods of time during which the vent stream was diverted from the incinerator or had no flow rate while the process unit was in operation.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically

identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:

CO emissions shall not exceed 14.39 pounds per hour and 63.04 tons per year.

Applicable Compliance Method:

This emissions limitation was developed by multiplying the CO emissions factor of 14.39 lb CO/hr, as established during the most recent stack test, by the maximum annual hours of operation (8,760 hr/yr) divided by 2,000 lb/ton. This emissions limit was established to reflect the potential to emit for this emissions unit.

If required, the permittee shall determine the actual CO emissions rate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

The permittee shall vent all emissions to a catalytic incinerator that is designed and operated to reduce emissions of total organic compounds (TOC) (less methane & ethane) by 98 weight percent or to a TOC (minus methane and ethane) concentration of 20 ppm by volume, on a dry basis corrected to 3 percent oxygen, whichever is less stringent.

Applicable Compliance Method:

The methods and procedures of 40 CFR 60.614 shall be used to demonstrate compliance. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

c. Emission limitation:

9.9 tons per rolling 12-month period for any individual HAP facility-wide.



Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

d. Emission limitation:

24.9 tons per rolling 12-month period combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated after the TF1 expansion, but not later than 180 days after initial startup of the new blower. Additional testing may be required consistent with Ohio EPA DAPC Engineering Guide #16 or by request of the Ohio EPA or Toledo Division of Environmental Services.

b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. The methods and procedures of 40 CFR 60.614 shall be used to demonstrate compliance.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

c. The test(s) shall be conducted while the emissions unit(s) served by the stack(s) is operating at or near the maximum capacity or current representative conditions, unless otherwise specified or approved by the Toledo Division of Environmental Services.

d. The permittee shall record the temperature immediately upstream and downstream of the incinerator's catalyst bed during each test run. The permittee shall determine the 3-hour average temperature immediately upstream and the 3-hour average temperature immediately downstream of the catalyst bed, and include the 3-hour average temperature values in the written test report.

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval



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Arclin USA, LLC

Permit Number: P0119452

Facility ID: 0448011550

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prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

- f. Personnel from the Toledo Division of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) None.



3. P801, Leak Detection and Repair

Operations, Property and/or Equipment Description:

Facility-wide fugitive emissions from equipment leaks

- 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. b)(1)c. and f)(1)a. and f)(1)b.
- 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 (Chapter 31 Modification)	The permittee shall comply with the applicable leak monitoring and repair requirements of 40 CFR 60, Subpart VV and OAC rule 3745-21-09(DD) and the practices and procedures implemented at the facility to identify leaks. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	see b)(2)b.
c.	OAC rule 3745-31-05(D) June 30, 2008 (Federally enforceable limitation to avoid Title V and MACT)	Facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 9.9 tons individual, or 24.9 tons of any combination of HAPs per rolling, 12-month period. See b)(2)c.
d.	OAC rule 3745-21-09(DD)	see b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	40 CFR Part 60 Subpart A	see b)(2)e.
f.	40 CFR Part 60 Subpart VV Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry (SOCMI) for which construction, reconstruction, or modification commenced after 1/5/81 and before 11/7/06.	see b)(2)f.
g.	40 CFR 60.482-2	Equipment leak standards for pumps in light liquid service
h.	40 CFR 60.482-3	Equipment leak standards for compressors.
i.	40 CFR 60.482-4	Equipment leak standards for pressure relief devices in gas/vapor service
j.	40 CFR 60.482-5	Equipment leak standards for sampling connection systems
k.	40 CFR 60.482-6	Equipment leak standards for open-ended valves or lines
l.	40 CFR 60.482-7	Equipment leak standards for valves in gas/vapor service and in light liquid service
m.	40 CFR 60.482-8	Equipment leak standards for pumps, valves, and connectors in heavy liquid service; and pressure relief devices in light liquid or heavy liquid service
n.	40 CFR 60.482-9	Standards for delay of repair of equipment leaks
o.	40 CFR 60.482-10	Standards for closed vent systems and control devices.
p.	40 CFR 60.483-1	Alternative standards for valves, via percentage of valves leaking ($\leq 2\%$)
q.	40 CFR 60.483-2	Alternative standards for valves, via skip period leak detection and repair

(2) Additional Terms and Conditions

- a. 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.

b)(1)a.

- b. 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.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled volatile organic compound (VOC) emissions from this air contaminant source since the potential to emit for VOC is less than 10 tons per year.

- c. The annual HAP emission limitations were established with additional recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions to ensure compliance with these limitations.
- d. The permittee shall comply with all applicable requirements of OAC rule 3745-21-09(DD). In accordance with OAC rule 3745-21-09(DD)(1), this facility produces urea-formaldehyde resin and formaldehyde which are chemicals listed in Appendix A of this rule.

The permittee may apply to the director for determination of an equivalent requirement in lieu of the requirements specified in paragraphs (DD)(2) to (DD)(10) of this rule. The determination of equivalence will be evaluated by the guidelines specified in OAC rule 3745-21-09(DD)(16)(b) to (DD)(16)(d). If the director approves an equivalent requirement for a process unit, said requirement shall be specified in the special terms and conditions of an operating permit or variance issued by the director for the process unit.

- e. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60. Per 40 CFR 60.486(k), the provisions of 40 CFR 60.7(b) and (d) do not apply to this emissions unit.
- f. The permittee shall comply with all applicable requirements of 40 CFR Part 60, Subpart VV. The provisions of 40 CFR Part 60 Subpart VV apply to affected facilities in the synthetic organic chemicals manufacturing industry as defined under 40 CFR 60.481. The process unit for production of formaldehyde is subject to the requirements of this rule. For purposes of this rule, the process unit also includes raw material, intermediate product and final product storage tanks.

c) Operational Restrictions

- (1) When a leak is detected a weatherproof identification tag with the equipment identification number and the date detected shall be attached to the leaking equipment,

valve, or seal. A record of the date the leak was first detected, the date of any attempted repair, and the date of final repair shall be entered into a log maintained for this purpose. Repair of a leak shall be attempted as soon as possible after it is detected.

- (2) Each compressor that is not equipped with a closed vent system capable of capturing and transporting any leakage from the drive shaft to a process, fuel gas system, or control device shall be equipped with a barrier fluid system to prevent VOC leakage to the atmosphere. Each barrier fluid system shall be equipped with a sensor that will detect failure of the seal and barrier fluid system; and the sensor shall be equipped with an audible alarm if it cannot be checked daily.
- (3) Except during pressure releases, each pressure relief device shall be operated with “no detectable emissions”, as indicated by an instrument reading of less than 500 ppm above background, as measured by Method 21 in 40 CFR 60 Appendix A and in accordance with 40 CFR 60.485(c). A pressure relief device shall be returned to a condition of “no detectable emissions” as soon as practicable following a pressure release, but no later than 5 days after the release. Any pressure relief device that is equipped with a closed-vent system capable of capturing and transporting leakage through the pressure relief device to a control device, the pipeline, process heater, or flare is excluded from these requirements.
- (4) A first attempt at repair of a leak shall be made no later than 5 days after each leak is detected. The leak shall be repaired as soon as practicable, but, with the exception of a pressure relief device (requiring repair within 5 days of release), not later than 15 days after it is detected unless meeting the requirements of 40 CFR 60.482-9, for delay of repair.
- (5) Each open ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve which shall seal the open end at all times, except during operations requiring process fluid flow. If equipped with a second valve, the valve on the process fluid end shall be closed before the second valve is closed. Where a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves, but shall seal the open end at all other times.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) A leak detection and repair program for equipment in the process unit shall be developed and implemented in accordance with the following requirements. Process units which produce urea-formaldehyde or formaldehyde are required to comply with these requirements.
 - a. A leak detection and repair program for equipment in the process unit shall be developed and implemented in accordance with the requirements specified in d)(1)b. to d)(1)l. and e)(1).
 - b. Except as otherwise provided in d)(1)c. and d)(1)d., equipment shall be monitored for leaks in accordance with the method specified in paragraph (F) of rule 3745-21-10 of the Administrative Code, as follows:

- i. Any pump in light liquid service shall be monitored monthly.

For purposes of OAC rule 3745-21-09(DD), "in light liquid service" means that the piece of equipment contains or contacts process fluid that meets all of the following conditions:

- (a) The process fluid is a liquid at operating conditions.
- (b) The vapor pressure of one or more of the pure components within the process fluid is greater than 0.04 pound per square inch at sixty-eight degrees Fahrenheit. Vapor pressures may be obtained from standard reference texts or may be determined by the method in ASTM D2879-70.
- (c) The total concentration of the pure components having a vapor pressure greater than 0.04 pound per square inch at sixty-eight degrees Fahrenheit is equal to or greater than twenty per cent by weight.

- ii. Any valve in gas/vapor service or in light liquid service shall be monitored monthly, except that quarterly monitoring may be employed any time after no leaks are detected during two consecutive months. The quarterly monitoring shall begin with the next calendar quarter following the two consecutive months of no detected leaks and shall be conducted in the first month of each calendar quarter. The quarterly monitoring may continue until a leak is detected, at which time monthly monitoring shall be employed again.

For purposes of OAC rule 3745-21-09(DD), "in gas/vapor service" means that the piece of equipment contains or contacts process fluid that is in the gaseous state at the operating conditions.

- iii. Any of the following equipment shall be monitored within five calendar days after evidence of a leak or potential leak from the equipment by visual, audible, olfactory, or other detection method:

- (a) Any pump in heavy liquid service;
- (b) Any valve in heavy liquid service;
- (c) Any pressure relief device in light liquid service or in heavy liquid service; and
- (d) Any flange or other connector.

For purposes of OAC rule 3745-21-09(DD), "in heavy liquid service" means that the piece of equipment is not in gas/vapor service or in light liquid service.

- iv. Any equipment in which a leak is detected as described in d)(1)g. shall be monitored within five working days after each attempt to repair, unless the permittee believes that the equipment was not successfully repaired.
- c. For any valve in gas/vapor service or in light liquid service, an alternative monitoring schedule may be employed in lieu of the monitoring schedule specified in d)(1)b.ii. as follows:
 - i. The valve is designated as unsafe to monitor and is monitored as frequently as practical during safe to monitor times, provided the following conditions are met:
 - (a) The permittee of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of monitoring on a monthly basis.
 - (b) The permittee of the valve adheres to a written plan that requires monitoring of the valve as frequently as practical during safe to monitor times.
 - ii. The valve is subject to an alternative monitoring schedule based on a skip period as specified in d)(11).
- d. Excluded from the monitoring requirements of d)(1)b. are the following equipment:
 - i. Any pump that has no externally actuated shaft penetrating the pump housing and that is designated for no detectable emissions as provided in d)(6);
 - ii. Any pump that is equipped with a dual mechanical seal which has a barrier fluid system and sensor that comply with the requirements specified in d)(7);
 - iii. Any pump that is equipped with a closed vent system capable of capturing and transporting any leakage from the pump seal to control equipment, provided the closed vent system and the control equipment comply with the requirements specified in d)(8) and d)(9);
 - iv. Any valve that has no externally actuated stem penetrating the valve and that is designated for no detectable emissions as provided in d)(6); and
 - v. Any valve that is subject to the alternative monitoring standard for valves based on the percentage of valves leaking as provided in d)(11).
- e. Any pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal, unless the pump is equipped with a closed vent system capable of transporting any leakage

from the pump seal to control equipment, and the closed vent system and control equipment comply with the requirements specified in paragraphs d)(8) and d)(9).

- f. Any sensor employed pursuant to d)(1)d.ii or d)(2) shall be checked daily, unless the sensor is equipped with an audible alarm.
- g. A leak is detected:
 - i. When a concentration of ten thousand ppmv or greater is measured from a potential leak interface of any equipment that is monitored for leaks using the method in OAC rule 3745-21-10(F);
 - ii. When there is an indication of liquids dripping from the seal of a pump in light liquid service; or
 - iii. When a sensor employed pursuant to d)(1)d.ii or d)(2) indicates failure of the seal system, the barrier fluid system, or both.
- h. When a leak is detected as described in d)(1)g., the following procedures shall be followed:
 - i. A weatherproof and readily visible identification tag, marked with the equipment identification number, is immediately attached to the leaking equipment.
 - ii. A record of the leak and any attempt to repair the leak is entered into the leak repair log kept pursuant to d)(1)k.
 - iii. The identification tag attached to the leaking equipment, other than a valve that is monitored pursuant to d)(1)b.ii., may be removed after the leaking equipment is repaired.
 - iv. The identification tag attached to a leaking valve that is monitored pursuant to d)(1)b.ii. may be removed after the leaking valve is repaired, monitored for leaks for two consecutive months as specified in d)(1)b.ii., and found to have no detected leaks during those two consecutive months.
- i. When a leak is detected as described in d)(1)g., the leaking equipment shall be repaired as soon as practicable, but no later than fifteen calendar days after the leak is detected, except for a delay of repair as provided in d)(10). Leaking equipment shall be deemed repaired if the maximum concentration measured pursuant to d)(1)b.iv. is less than ten thousand ppmv.
- j. When a leak is detected as described in d)(1)g., a first attempt at repair shall be made no later than five calendar days after the leak is detected; and the first attempts at repair shall include, but are not limited to, the following best practices where practicable:
 - i. Tightening of bonnet bolts;

- ii. Replacement of bonnet bolts;
 - iii. Tightening of packing gland nuts; and
 - iv. Injection of lubricant into lubricated packing.
- k. When a leak is detected as described in d)(1)g., the following information shall be recorded in a leak repair log:
- i. The identification number of the leaking equipment and, for leaks based on monitoring, the identification numbers of the leak detection instrument and its operator;
 - ii. The basis for the detection of the leak; for example, monitoring, visual inspection, or sensor;
 - iii. The date on which the leak was detected and the date of each attempt to repair the leaking equipment;
 - iv. The methods of repair applied in each attempt to repair the leaking equipment;
 - v. One of the following entries within five working days after each attempt to repair the leaking equipment:
 - (a) “Not monitored,” denoting the leaking equipment was presumed to still be leaking and it was not monitored; or
 - (b) If the leaking equipment was monitored with a leak detection instrument, the maximum concentration that was measured as follows:
 - (i) The actual reading in ppmv; or
 - (ii) “Below 10,000,” denoting less than ten thousand ppmv; or
 - (iii) “Above 10,000,” denoting not less than ten thousand ppmv;
 - vi. If the leak is not repaired within fifteen calendar days after the date on which it was detected:
 - (a) “Repair delayed” and the reason for the delay;
 - (b) If repair is being delayed until the next process unit shutdown due to technical infeasibility of repair, the signature of the permittee whose decision it was that repair is technically infeasible without a process unit shutdown;
 - (c) The expected date of successful repair of the leak;

(d) The dates of process unit shutdowns that occur while the leaking equipment is unrepaired; and

vii. The date on which the leak was successfully repaired.

l. The leak repair log shall be retained by the permittee of the process unit in a readily accessible location for a minimum of two years after the date on which the record was made.

[OAC rule 3745-21-09(DD)(2)]

(2) Any compressor required to comply with OAC rule 3745-21-09(DD) shall be equipped with a seal that has a barrier fluid system and sensor which comply with the requirements specified in d)(7).

a. Excluded from the requirements of d)(2) is any compressor that is designated for no detectable emissions as provided in d)(6).

b. Excluded from the requirements of d)(2) is any compressor that is equipped with a closed vent system capable of capturing and transporting any leakage from the compressor seal to control equipment, provided the closed vent system and the control equipment comply with the requirements specified in d)(8) and d)(9).

[OAC rule 3745-21-09(DD)(3)(a) - (d)]

(3) Any pressure relief device in gas/vapor service required to comply with OAC rule 3745-21-09(DD) shall, except during pressure releases, be operated with no detectable emissions, as indicated by an instrument reading of less than five hundred ppmv above background, as measured by the method specified in OAC rule 3745-21-10(F).

a. After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions as soon as practicable, but no later than five calendar days after the pressure release, except for a delay of repair as provided in d)(10).

b. No later than five calendar days after a pressure release, the pressure relief device shall be tested to confirm the condition of no detectable emissions in accordance with the method specified in OAC rule 3745-21-10(F).

c. Excluded from the requirements of paragraph d)(3) and d)(3)b. is any pressure relief device that is equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to control equipment, provided the closed vent system and control equipment comply with the requirements specified in d)(8) and d)(9).

[OAC rule 3745-21-09(DD)(4)(a) - (e)]

(4) Any sampling connection system required to comply with OAC rule 3745-21-09(DD) shall be equipped with a closed purge system or a closed vent system that meets one of the following requirements:

- a. The purged process fluid is returned directly to the process line with zero VOC emissions to the ambient air;
- b. The purged process fluid is collected and recycled with zero VOC emissions to the ambient air; or
- c. The closed purge system or closed vent system is designed and operated to capture and transport all the purged process fluid to control equipment that meet the requirements specified in d)(9).

Excluded from the requirements of d)(4) is any sampling connection system that is an in-situ sampling system.

[OAC rule 3745-21-09(DD)(5)(a) -(c)]

- (5) Any open-ended valve or line required to comply with OAC rule 3745-21-09(DD) shall be equipped with a cap, blind flange, plug, or second valve and shall comply with the following requirements.
 - a. If equipped with a second valve, the open-ended valve or line shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.
 - b. Except during operations requiring the flow of process fluid through the open-ended valve or line, the cap, blind flange, plug, or second valve shall seal the open end of the open-ended valve or line.
 - c. If a double block and bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves, but shall comply with d)(5)b. at all other times.

[OAC rule 3745-21-09(DD)(6)(a) - (d)]

- (6) Any equipment (pump, valve, or compressor) designated for no detectable emissions pursuant to d)(1)d.i., d)(1)d.iv. or d)(2)a. shall comply with the following requirements.
 - a. The equipment shall be operated with no detectable emissions as indicated by an instrument reading of less than five hundred ppmv above background as measured by OAC rule 3745-21-10(F).
 - b. The equipment shall be tested for compliance with d)(6)a. initially upon designation and annually.
 - c. The designation of the equipment shall be signed by the permittee of the equipment in the log kept pursuant to d)(13)a.

[OAC rule 3745-21-09(DD)(7)(a) - (d)]

- (7) Barrier fluid systems and sensors for pumps and compressors

- a. When a pump or compressor is equipped with a seal that has a barrier fluid system and sensor which are employed to meet the requirements of d)(1)d.ii., or d)(2), the requirements of d)(7)b. to d. shall be met.
- b. The barrier fluid system shall meet one of the following conditions:
 - i. The barrier fluid system is operated with a barrier fluid at a pressure that is at all times greater than the stuffing box pressure of the pump or compressor.
 - ii. The barrier fluid system is equipped with a barrier fluid degassing reservoir that is connected by a closed vent system to control equipment and the closed vent system and control equipment comply with the requirements specified in d)(8) and d)(9).
 - iii. The barrier fluid system is equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the ambient air.
- c. The barrier fluid system shall be in heavy liquid service or shall not be in VOC service.
- d. The barrier fluid system shall be equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both based on criteria determined by the permittee from design considerations and operating experience.

[OAC rule 3745-21-09(DD)(8)(a) - (d)]

- (8) Any closed vent system that is used to comply with the requirements of d)(1)d.iii., d)(2)b., d)(3)c., d)(4)c., d)(7)b.ii., or d)(10)c.ii. shall comply with the following requirements.
 - a. The closed vent system shall be designed and operated with no detectable emissions, as indicated by an instrument reading of less than five hundred ppmv above background, as measured by the method specified in OAC rule 3745-21-10(F).
 - b. The closed vent system shall be tested for compliance with d)(8)a. initially and annually.
 - c. The closed vent system shall be operated at all times when emissions may be vented to it.

[OAC rule 3745-21-09(DD)(9)(a) - (d)]

- (9) Any control equipment that is used to comply with the requirements of d)(1)d.iii., d)(2)b., d)(3)c., or d)(7)b.ii. shall comply with the following requirements.
 - a. If the control equipment is a vapor recovery system, it shall be designed and operated to recover VOC emissions vented to it with an efficiency of at least ninety-five per cent by weight.

- b. If the control equipment is an enclosed combustion device, it shall be designed and operated to reduce the VOC emissions vented to it with an efficiency of at least ninety-five per cent by weight, or to provide a minimum residence time of 0.75 second at a minimum temperature of fifteen hundred degrees Fahrenheit.
- c. The permittee of the control equipment shall monitor the control equipment to ensure that it is operated and maintained in conformance with its design.
- d. The control equipment shall be operated at all times when emissions may be vented to it.

[OAC rule 3745-21-09(DD)(10)(a) - (c)]

- (10) A delay of repair that is employed pursuant to d)(1)i. or d)(3)a. shall be allowed only as provided in the following paragraphs.
 - a. A delay of repair shall be allowed if the repair is technically infeasible without a process unit shutdown. However, the repair shall occur before the end of the next process unit shutdown.
 - b. A delay of repair shall be allowed for a piece of equipment that is isolated from the process and that does not remain in VOC service (for example, isolated from the process and properly purged).
 - c. A delay of repair for a valve shall be allowed if:
 - i. The permittee demonstrates that the emission of purged material resulting from immediate repair is greater than the emission likely to result from delay of repair; and
 - ii. When repair procedures are effected, the purged material is collected and destroyed or recovered in control equipment that meets the requirements specified in d)(9).
 - d. A delay of repair for a pump shall be allowed if:
 - i. The repair requires the use of a dual mechanical seal system and associated barrier fluid system; and
 - ii. The repair is completed as soon as practicable, but no later than six months after the leak was detected.
 - e. A delay of repair beyond a process unit shutdown shall be allowed for a valve if a valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. A delay of repair beyond the next process unit shutdown shall not be allowed for that valve unless the next process unit shutdown occurs sooner than six months after the first process unit shutdown.

[OAC rule 3745-21-09(DD)(11)]

- (11) The permittee may elect to implement an alternative monitoring schedule in lieu of the monitoring requirements specified in d)(1)b.ii., as provided in d)(1)d.v. The alternative monitoring schedule shall be based on skipping quarterly monitoring periods provided the percentage of valves leaking is no more than 2.0. If the permittee elects to implement an alternative monitoring schedule, then the permittee shall comply with the requirements specified in the following paragraphs.
- a. The permittee shall notify the Toledo Division of Environmental Services prior to implementing this alternative monitoring schedule. Such notification must identify which valves will be subject to this alternative monitoring schedule and which work practice within d)(11)d. will be implemented. Any valve in vacuum service, in heavy liquid service, or not in VOC service, shall be excluded from this alternative monitoring schedule.
 - b. Any valve subject to this alternative monitoring schedule shall comply initially with the monitoring requirements specified in d)(1)b.ii.
 - c. Any valve subject to this alternative monitoring schedule shall continue to be subject to the requirements specified in d)(1)g. to d)(1)l. and e)(1).
 - d. One of the following two alternative work practices for skipping monitoring periods may be implemented:
 - i. After two consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2.0, a monitoring program may begin in which the first quarter of every two consecutive quarterly leak detection periods is skipped.
 - ii. After five consecutive quarterly leak detection periods with the percentage of valves leaking equal to or less than 2.0, a monitoring program may begin in which the first three quarters of every four consecutive quarterly periods is skipped.
 - e. If the percentage of valves leaking is greater than 2.0, the permittee shall comply with the monitoring requirements as specified in d)(1)b.ii., but may again elect to use this alternative monitoring schedule.
 - f. The percentage of valves leaking shall be determined for the valves subject to this alternative monitoring schedule as the sum of the number of those valves found leaking during any portion of the current monitoring period and the number of those valves found leaking during a previous monitoring period for which repair has been delayed during the current monitoring period, divided by the total number of valves, and multiplied by one hundred.
 - g. The following information pertaining to valves subject to this alternative monitoring schedule shall be recorded in a log that is kept in a readily accessible location:
 - i. A schedule of monitoring; and

- ii. The percentage of valves leaking during each monitoring period.

[OAC rule 3745-21-09(DD)(12)]

- (12) The permittee may elect to implement an alternative monitoring standard in lieu of the monitoring requirements specified in, d)(1)b.ii., as provided in d)(1)d.v. The alternative monitoring standard shall be based on maintaining the percentage of valves leaking at 2.0 or less. Any permittee who elects to implement an alternative monitoring standard shall comply with the following requirements.
 - a. The permittee shall notify the Toledo Division of Environmental Services prior to implementing this alternative monitoring standard.
 - b. All valves in gas/vapor service or in light liquid service in the process unit shall be subject to this alternative monitoring standard, except for those valves which are designated as unsafe to monitor as provided in paragraph d)(1)c.i., those valves not in VOC service, and those valves in vacuum service.
 - c. The percentage of valves leaking, as determined in accordance with d)(12)e., shall not exceed 2.0. If the percentage of valves leaking is greater than 2.0, the permittee shall comply with the monitoring requirements as specified in d)(1)b.ii., but may again elect to use this alternative monitoring standard.
 - d. All valves subject to this alternative monitoring standard shall be tested for compliance with d)(12)c. initially upon implementation and annually.
 - e. A compliance test shall be conducted in the following manner:
 - i. All valves subject to this alternative monitoring standard shall be monitored for leaks within a one-week period by the method specified in OAC rule 3745-21-10(F).
 - ii. If an instrument reading of ten thousand ppmv or greater is measured, a leak is detected.
 - iii. The percentage of valves leaking shall be determined as the number of valves for which a leak is detected, divided by the number of valves monitored, and multiplied by one hundred.
 - f. When a leak is detected as described in d)(12)e.ii., the leaking valve shall be repaired in accordance d)(1)h. and d)(1)i.

[OAC rule 3745-21-09(DD)(13)]

- (13) The permittee shall comply with the following recordkeeping requirements. The permittee may use one recordkeeping system for more than one process unit to comply with the recordkeeping requirements, provided the system identifies each record by each process unit.
 - a. The following information shall be recorded in a log that is kept in a readily accessible location:

- i. A list of identification numbers for equipment subject to the requirements of d)(1) through d)(9);
 - ii. A list of identification numbers for equipment designated for no detectable emissions as provided in d)(6), and a signature of the permittee authorizing such designation;
 - iii. A list of identification numbers for pressure relief devices subject to d)(3);
 - iv. A list of identification numbers for closed vent systems subject to d)(8); and
 - v. For compliance tests required under paragraphs d)(3)b., d)(6)b., and d)(8)b.:
 - (a) The date of each compliance test;
 - (b) The background level measured during each compliance test; and
 - (c) The maximum instrument reading measured at the equipment during each compliance test.
- b. The following information pertaining to valves subject to an alternative monitoring schedule, as provided in d)(1)c., shall be recorded in a log that is kept in a readily accessible location:
- i. A list of identification numbers for valves designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe to monitor, and the plan for monitoring each valve;
 - ii. A list of identification numbers for valves subject to the alternative monitoring schedule based on a skip period, a schedule for monitoring, and the percentage of valves leaking during each monitoring period.
- c. The following information pertaining to closed vent systems and control equipment described in d)(8) and d)(9) shall be recorded and kept in a readily accessible location:
- i. Detailed schematics, design specifications, and piping and instrumentation diagrams;
 - ii. The dates and descriptions of any changes in the design specifications;
 - iii. Periods when the closed vent systems and control equipment are not operated as designed, including periods when a flare pilot light does not have a flame; and
 - iv. Dates of startups and shutdowns of the closed vent systems and control equipment.

- d. The following information pertaining to barrier fluid systems and sensors described in d)(7) shall be recorded in a log that is kept in a readily accessible location:
 - i. A list of identification numbers of pumps and compressors equipped with such barrier fluid systems and sensors;
 - ii. The criteria that indicate failure of the seal system, the barrier fluid system, or both, as required in d)(7)d. and an explanation of the criteria; and
 - iii. Any changes to such criteria and the reasons for the changes.
- e. The following information for use in determining an exemption for the process unit as provided in d)(15) shall be recorded in a log that is kept in a readily accessible location:
 - i. A statement listing the feed and raw materials and products from the process unit and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohols; or
 - ii. An analysis demonstrating that no equipment is in VOC service.
- f. The following information pertaining to specific equipment that are exempt as provided in d)(14) shall be recorded in a log that is kept in a readily accessible location:
 - i. A list of identification numbers of equipment in vacuum service; and
 - ii. A list of identification numbers of equipment not in VOC service and the information or data used to demonstrate that the equipment is not in VOC service.

[OAC rule 3745-21-09(DD)(14)]

(14) Exempted from the requirements of d)(1) are the following equipment:

- a. Any equipment not in VOC service, as determined in accordance with paragraph (O)(2) of rule 3745-21-10 of the Administrative Code; and

For purposes of OAC rule 3745-21-09(DD), "In VOC service" means that the piece of equipment contains or contacts a process fluid that is at least ten per cent VOC by weight.
- b. Any equipment in vacuum service (operating at an internal pressure that is at least 0.7 pound per square inch below ambient pressure).

[OAC rule 3745-21-09(DD)(17)(b)(i) and (ii)]

(15) Exempted from the requirements of d)(1) are the following process units:

- a. Any process unit that produces only heavy liquid chemicals from heavy liquid feed or raw materials;

"In heavy liquid service" means that the piece of equipment is not in gas/vapor service or in light liquid service.

- b. Any process unit that has no equipment in VOC service as determined in accordance with paragraph (O)(2) of rule 3745-21-10 of the Administrative Code.

[OAC rule 3745-21-09(DD) (17)(a)(ii) and (iv)]

(16) [40 CFR 60, Subpart VV] NSPS FOR EQUIPMENT LEAKS OF VOC IN THE SYNTHETIC ORGANIC CHEMICALS MANUFACTURING INDUSTRY

The permittee shall comply with the applicable monitoring and record keeping requirements required in 40 CFR 60, Subpart VV, including the following sections briefly summarized:

A	60.482-1(b)	<i>Standards-General:</i> Compliance is determined by review of records, reports, review of performance test results and inspections.
b	60.482-1(c)	Equivalence of means of emissions limitation.
C	60.482-1(d)	Equipment in vacuum service exemption
D	60.482-1(e)	Exemption for equipment in service less than 300 hrs/yr.
E	60.482-1(f)	Alternate frequency for batch process units.
F	60.482-1(g)	Assignments for storage vessels shared with multiple units.
G	60.482-2(a), (b) and (c)	<i>Standards-Pumps in Light Liquid Service:</i> Visually check pumps weekly for indications of leaks. Monitor pumps monthly according to Method 21 for leaks of 10,000 ppm or greater. First attempt at repair shall be made within 5 days and repaired no later than 15 days. If indications of liquids dripping from pump, monitor according to Method 21 within 5 days or designate as a leak. Defines first attempt at repair.
H	60.482-2(d) through (h)	Exemptions for certain types of pumps meeting specific requirements.
I	60.482-3(a) through (g)	<i>Standards-Compressors:</i> Each compressor shall be equipped with a seal system that includes a barrier fluid system. Each barrier fluid system (see 60.482-3(b)&(c)) shall be equipped with a sensor that will detect failure of the seal system, barrier fluid or both, checked daily or equipped with an audible alarm. Determine criterion that indicates failure of the seal system, barrier fluid, or both. If sensor

		indicates failure of the seal system, barrier system or both, a leak is detected. First attempt at repair shall be made within 5 days and repaired no later than 15 days.
J	60.482-3(h), (i) and (j)	<i>Standards-Compressors:</i> Exemptions for certain types of compressors meeting specific requirements.
K	60.482-4(a) and (b)	<i>Standards-Pressure Relief Devices in Gas/Vapor Service:</i> They shall be operated with no detectable emissions (<500 ppm above background). Within 5 days after a pressure release, the device must be remonitored to confirm conditions of no detectable emissions. First attempt at repair shall be made within 5 days and repaired no later than 15 days.
L	60.482-4(c) and (d)	<i>Standards-Pressure Relief Devices in Gas/Vapor Service:</i> Exemptions for certain types of pressure relief devices meeting specific requirements.
M	60.482-5(a) through (c)	<i>Standards-Sampling Connection Systems:</i> each sampling connection system shall be equipped with a closed- purged, closed-loop or closed-vent system and shall comply with the requirements of 60.482-5(b). In situ sampling systems and sampling systems without purges are exempt from the above.
N	60.482-6(a) through (e)	<i>Standards-Open-Ended Valves or Lines</i>
O	60.482-7(a) through (h)	<i>Standards-Valves in Gas/Vapor Service in Light Liquid Service:</i> Valves are monitored monthly to detect leaks (>10,000 ppm). First attempt at repair shall be made within 5 days and repaired no later than 15 days. If a leak is detected, the valve is monitored monthly until a leak is not detected for 2 successive months. See 60.482-7(f)-(h) for information regarding valves with no detectable emissions, unsafe-to-monitor or difficult-to-monitor valves.
P	60.482-8(a) through (d)	<i>Standards-Pumps and Valves in Heavy Liquid Service, Pressure Relief Devices in Light Liquid or Heavy Liquid Service, and Connectors:</i> Evidence of a leak is found by visual, audible, olfactory or other detection methods. The equipment shall be monitored within 5 days using Method 21 for leaks (>10,000 ppm). First attempt at repair shall be made within 5 days and repaired no later than 15 days.
q	60.482-9(a) through (f)	<i>Standards-Delay of Repair.</i> Delay of repair of equipment with leaks is allowed if repair within 15 days is infeasible without a process shutdown. Requirements for delay of repair of equipment not in VOC service; valves; pumps and

		beyond a process unit shutdown.
r	60.482-10(a) through (h) and (m)	<i>Standards-Closed Vent Systems and Control Devices:</i> Vapor recovery systems shall have a VOC recovery efficiency of 95% or greater, or to an exit concentration of 20 ppmv; enclosed combustion devices shall have an efficiency of 95% or greater, or to an exit concentration of 20 ppmv, dry basis, corrected to 3% oxygen or provide a minimum residence time of 0.75 seconds at minimum temperature of 816°C. Flares will comply with requirements of 60.18. Leaks (>500 ppmv above background) shall have a first attempt at repair made within 5 days and repaired no later than 15 days. Requirements for leaks, annual inspections, delay of repair.
s	60.482-10(i) through (l)	<i>Standards-Closed Vent Systems and Control Devices:</i> Exemptions for certain types of vapor collection systems meeting specific requirements and the recordkeeping requirements for exempt closed vent systems.
t	60.483-1 and 60.483-2	<i>Alternative Standards for Valves:</i> Allowable Percentage of Valves Leaking and for Valves-Skip Period Leak Detection and Repair
u	60.486(a)	<i>Recordkeeping Requirements:</i> Combined records for affected facilities.
v	60.486(b) and (c)	Identification and log for leaks from pumps, compressors, valves and connectors.
w	60.486(d)	Records of design requirements for closed vent systems and control devices.
x.	60.486(e)	Log for equipment subject to 60.482-1 through 60.482-10.
y.	60.486(f)	Records for pumps and valves that are unsafe-to-monitor and valves that are difficult-to-monitor.
z.	60.486(g)	Records for valve skip period leak detection and repair.
aa.	60.486(h)	Log for pumps with dual mechanical seal systems and for compressor seal systems.
bb.	60.486(j)	Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (3) [40 CFR 60, Subpart VV] NSPS FOR EQUIPMENT LEAKS OF VOC IN THE SYNTHETIC ORGANIC CHEMICALS MANUFACTURING INDUSTRY

The permittee shall submit semiannual reports and other such notifications and reports as are required pursuant to 40 CFR Part 60, Subpart VV, including the following sections briefly summarized:

	60.487(a)	Each owner or operator subject to the provisions of this subpart shall submit semiannual reports to the Administrator beginning six months after the initial startup date.
	60.487(c)	Submit semiannual reports that includes the content of 60.487(c).
	60.487(d)	Notify the Administrator 90 days before implementation, if the permittee elects to comply with the alternative provisions of 60.483-1 or 60.483-2.
	60.487(e)	Submit the results of all performance tests in accordance with 60.8, if applicable.

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:

9.9 tons per rolling 12-month period for any individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

b. Emission limitation:

24.9 tons per rolling 12-month period combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

g) Miscellaneous Requirements

(1) None.

4. T059, METHANOL TANK

Operations, Property and/or Equipment Description:

100,000 gallon internal floating roof methanol 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. b)(1)b. and f)(1)b. and f)(1)c.

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 compounds (VOC) emissions shall not exceed 1.8 tons per year.</p> <p>See b)(2)a.</p>
b.	<p>OAC rule 3745-31-05(D) June 30, 2008 (Federally enforceable limitation to avoid Title V and MACT)</p>	<p>Facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 9.9 tons individual, or 24.9 tons of any combination of HAPs per rolling, 12-month period.</p> <p>See b)(2)b.</p>
c.	40 CFR Part 60 Subpart A	see b)(2)c.
d.	<p>40 CFR Part 60 Subpart Kb (40 CFR 60.110b – 60.117b) [In accordance with 63.110b, this subpart applies to each storage vessel with a capacity greater than or equal to 75 cubic meters that is</p>	see c)(1).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	used to store volatile organic liquids (VOL) for which construction commenced after July 23, 1984]	

(2) Additional Terms and Conditions

- a. Compliance with this rule also includes compliance with the requirements of 40 CFR Part 60 Subpart Kb.
- b. The annual HAP emission limitations were established with additional recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions to ensure compliance with these limitations
- c. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operating requirements required pursuant to 40 CFR Part 60, Subpart Kb, including the following sections.

a.	60.112b(a)(1)	The permittee shall equip the storage vessel with a fixed roof in combination with an internal floating roof meeting the following specifications:
b.	60.112b(a)(1)(i)	The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
c.	60.112b(a)(1)(ii)	Each internal floating roof shall be equipped with one of the closure devices in §60.112b(a)(1)(ii)(A), (1)(ii)(B), or (1)(ii)(C) between the wall of the storage vessel and the edge of the internal floating roof:
d.	60.112b(a)(1)(iii)	Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

e.	60.112b(a)(1)(iv)	Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
F	60.112b(a)(1)(v)	Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
G	60.112b(a)(1)(vi)	Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
H	60.112b(a)(1)(vii)	Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
I	60.112b(a)(1)(viii)	Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
J	60.112b(a)(1)(ix)	Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and record keeping requirements required pursuant to 40 CFR Part 60, Subpart Kb, including the following sections.

40 CFR 60.113b(a) – Inspections		
a.	60.113b(a)(1)	<i>Inspections prior to filling the tank:</i> Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or

		defects in the internal floating roof, or both, then repair the items before filling the storage vessel.
b.	60.113b(a)(2)	<p><i>Annual Inspections:</i> For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill.</p> <p>If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, then repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections and cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in 40 CFR Part 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.</p>
c	60.113b(a)(3)	<p>For vessels equipped with a double-seal system as specified in 40 CFR Part 60.112b(a)(1)(ii)(B):</p> <p>visually inspect the vessel as specified in 40 CFR Part 60.113b(a)(4) at least every 5 years; or</p> <p>-visually inspect the vessel as specified in 40 CFR Part 60.113b(a)(2).</p>
d	60.113b(a)(4)	<p><i>Inspections when tank is emptied and degassed:</i> Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that None of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater</p>

		than 10 years in the case of vessels conducting the annual visual inspection as specified in 40 CFR Part 60.113b(a)(2).
60.115b – Recordkeeping and Reporting		
e	60.115b(a)(2)	<i>Recordkeeping Requirements:</i> The permittee shall keep a record of each inspection performed as required by 40 CFR Part 60.113b(a). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
60.116b – Monitoring of Operations		
F	60.116b(a)	Keep copies of all records required by 40 CFR Part 60, Subpart Kb for at least 5 years, except for the record required by 40 CFR Part 60.116b(b) which will be kept for the life of the source.
G	60.116b(b)	Keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
H	60.116b(c)	Maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure (to determine the maximum true vapor pressure, see 40 CFR Part 60.116b(e)) of that VOL during the respective storage period.
I	60.116b(e)	Methodology used to determine the maximum true vapor pressure.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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 submit reports and such other notifications and reports to the appropriate Ohio EPA District office or local air agency as are required pursuant to 40 CFR Part 60, Subpart Kb, per the following sections:

a	60.113b(a)(5)	Notify Toledo Environmental Services (TES) in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR Part 60.113b(a)(1) and (a)(4) to afford the Administrator the
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		<p>opportunity to have an observer present. If the inspection required by 40 CFR Part 60.113b(a)(4) is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.</p>
b	60.115(a)(3)	<p>If any of the conditions described in 40 CFR Part 60.113b(a)(2) are detected during the annual visual inspection, a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made</p>
c	60.115(a)(4)	<p>For vessels with a double seal, after each inspection required by 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 61.112b(a)(1) or §60.113b(a)(3) and list each repair made.</p>

- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:

1.8 tons per year VOC

Applicable Compliance Method:

Compliance with the VOC emission limitation shall be determined using the latest version of TANKS software, using the actual annual throughput and annual average vapor pressure.

b. Emission limitation:

9.9 tons per rolling 12-month period for any individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

c. Emission limitation:

24.9 tons per rolling 12-month period combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -resin kettles: P001,P002,

EU ID	Operations, Property and/or Equipment Description
P001	Resin manufacturing process with catalytic incinerator
P002	Resin manufacturing process with catalytic incinerator

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. b)(1)b., c)(1), d)(1) through d)(3), e)(1), f)(1)c. and f)(1)d.

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 compounds (VOC) emissions from each emissions unit shall not exceed 0.22 pound per hour and 0.96 ton per year.</p> <p>See b)(2)a.</p>
b.	<p>OAC rule 3745-31-05(D) June 30, 2008 (Federally enforceable limitation to avoid Title V and MACT)</p>	<p>Facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 9.9 tons individual, or 24.9 tons of any combination of HAPs per rolling, 12-month period.</p> <p>See b)(2)b.</p>
c.	OAC rule 3745-21-09(DD)	See b)(2)c.

(2) Additional Terms and Conditions

- a. The emissions from the emissions units listed above shall be vented to a catalytic incinerator at all times one or more of the emissions units is in operation.
- b. The annual HAP emission limitations were established with additional recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions to ensure compliance with these limitations.
- c. The permittee shall comply with all applicable requirements of OAC rule 3745-21-09(DD). The terms and conditions associated with this rule are contained in the terms for Emissions Unit P801.

c) Operational Restrictions

- (1) The catalytic incinerator shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals. The conversion efficiency of the catalyst, as determined in an annual catalyst activity test, shall be sufficient to meet the destruction efficiency and control efficiency requirements of this permit at a test temperature that is equal to that temperature at which the inlet to the catalyst bed is set. Solvent loading during the catalyst activity test shall be consistent with the test laboratory's normal testing protocol.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable temperature of the exhaust gases immediately before the catalyst bed, during any period of time when the emissions unit(s) controlled by the catalytic incinerator is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.
- (2) The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream of the incinerators' catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance; and
- b. A log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

- (3) The permittee shall perform a preventative maintenance inspection of the catalytic incinerator on an annual basis to evaluate the performance of the catalyst bed. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations, and shall include a physical inspection of the unit and all of the associated equipment, including but not limited to burners, controls, dampers, valves, and monitoring and recording equipment. Repair and replacement of equipment and the catalyst shall be performed as determined by the inspection. During each annual inspection a sample of the catalyst material shall be collected from the catalyst bed and used to perform a catalyst activity test. The permittee shall maintain a record of the results of each annual inspection and the results of each annual catalyst activity test.

The permittee shall also perform weekly inspections of the external integrity of the catalytic incinerator. Records shall be maintained of the inspections and the date(s) of catalyst replacement, and if only partial, the amount or percent of the total catalyst replaced.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all 3-hour blocks of time (when the emissions unit(s) was/were in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature established during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;
 - ii. any records of downtime (date and length of time) for the capture (collection) system, catalytic incinerator, and/or the monitoring equipment when the emissions unit(s) was/were in operation; and
 - iii. a log of the operating time for the capture system, catalytic incinerator, monitoring equipment, and the emissions unit(s).
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
 - (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the wet scrubbers and catalytic incinerator during the 12-month reporting period for these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the average temperature of the exhaust gases immediately before the catalyst bed was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to a catalytic incinerator; and
 - c. the results of any catalyst activity test(s) along with a summary of the results of the annual inspection of the internal integrity of the catalytic incinerator.
 - (4) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- 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 each emissions unit shall not exceed 0.22 pound per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with OAC rule 3745-21-10(C). Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

b. Emission Limitation:

VOC emissions from each emissions unit shall not exceed 0.96 ton per year

Applicable Compliance Method:

Compliance may be determined by the following one-time calculation. Multiply the short-term allowable VOC emission limitation (0.22 lb/hr) by the maximum annual hours of operation (8,760 hours), and then divide by 2,000 pounds per ton.

c. Emission limitation:

9.9 tons per rolling 12-month period for any individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

d. Emission limitation:

24.9 tons per rolling 12-month period combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

g) Miscellaneous Requirements

(1) None.