



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL
SUMMIT COUNTY**

CERTIFIED MAIL

Application No: 16-01986

DATE: 1/26/00

Ashland Inc
Todd Harris
5200 Blazer Parkway
Dublin, OH

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA
PA

ARAQMD
WV

Akron Metro Area Trans Study



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 16-01986

Application Number: 16-01986
APS Premise Number: 1677130036
Permit Fee: **To be entered upon final issuance**
Name of Facility: Ashland Inc
Person to Contact: Todd Harris
Address: 5200 Blazer Parkway
Dublin, OH 43017

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1842 Enterprise Parkway
Twinsburg, Ohio**

Description of proposed emissions unit(s):
Chemical packaging plant.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
Organic Compounds	49.9
Total Hazardous Air Pollutants	24.9
Individual Hazardous Air Pollutants	9.9

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Submerged fill drumming line for filling 55 gallon drum, consisting of a drumming station, hard and flexible piping and electric pumps.	OAC Rule 3745-31-05(A)(3)	Compliance with the special terms and conditions of this permit and with the Ohio Air Toxics Policy.
	OAC Rule 3745-35-07	Facility-wide emissions shall be limited to: 49.9 TPY organic materials, 24.9 TPY hazardous air pollutants, and 9.9 TPY any single HAP, Based on a rolling 12-month summation.
	OAC rule 3745-15-07	See 2.a Below

- 2.a. The Permittee shall not emit or allow the escape into the open air any smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combination of substances in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property.
- 2.b. The Facility-wide emissions stated above shall include all the emissions from the Bulk facility and the warehouse facility combined.

B. Operational Restrictions

1. The emissions of organic compounds (VOCs) shall not exceed 49.9 tons per year for the entire facility as a rolling 12-month summation.
2. The emissions of all hazardous air pollutants (HAPs) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.
3. The emissions of any one HAP shall not exceed 9.9 tons for the entire facility as a rolling

Ashla

PTI A

Emissions Unit ID: **P008**

To be entered upon final issuance
12-month summation.

4. The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of volatile organic compounds, combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors).
2. These records and all supporting data shall be retained in the company's files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
3. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Akron Regional Air Quality Management District in writing of any daily record showing an exceedance of any emission limitation(s) or operating restriction(s). A copy of such record shall be sent to the Akron Regional Air Quality Management District within 60 days following the occurrence. The report shall include (a) the probable cause of such deviations, and (b) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. The permittee need not file quarterly deviation reports as outlined in General Term and Condition A.2.b.
2. The permittee shall notify the Akron Regional Air Quality Management District in writing of any monthly record showing an exceedance of the

Emissions Unit ID: **P008**

facility-wide emission limitation for organic compounds, combined HAP*s or any individual HAP, as set forth in B.1-3. A copy of such record shall be sent to the Akron Regional Air Quality Management District within 60 days following the occurrence. The reports shall include (a) the probable cause of such deviations, and (b) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. The permittee need not file quarterly deviation reports as outlined in General Term and Condition A.2.b.

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- 3. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAP*s, and individual HAP*s. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year's activities.

E. Testing Requirements

1. Compliance with the emission limitations in PTI #16-1986 shall be determined in accordance with the following methods:
 - a. Emission Limitation:

The total facility-wide emissions of organic materials, and Hazardous Air Pollutants.

Applicable Compliance Method:

Monthly and rolling 12-month records demonstrating compliance with the facility wide emissions of volatile organic compounds, combined HAPs and individual HAPs from the entire facility (including fugitive emissions from pumps, valves and connectors).

F. Miscellaneous Requirements

- 1 The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.

Ashla

PTI A

To be entered upon final issuance

Emissions Unit ID: P009

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Splash fill drumming line for filling 55 gallon drum, consisting of a drumming station, hard and flexible piping and electric pumps.	OAC Rule 3745-31-05(A)(3)	Compliance with the special terms and conditions of this permit and with the Ohio Air Toxics Policy. The Permittee shall use splash filling for small containers and high viscosity material (like polymeric Resins), filling of drum with low viscosity materials shall be done in P008.
	OAC rule 3745-15-07	See 2.a Below
	OAC Rule 3745-35-07	Facility-wide emissions shall be limited to: 49.9 TPY organic materials, 24.9 TPY hazardous air pollutants, and 9.9 TPY any single HAP, Based on a rolling 12-month summation.

2. Additional Terms and Conditions

Ashland Inc
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To be

Facility ID: 1677130036

Emissions Unit ID: **P009**

- 2.a** Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.

B. Operational Restrictions

1. All filling operations done at emissions unit P009 will be performed using submerged or bottom fill except for small containers and high viscosity materials.
2. Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.

D. Reporting Requirements

1. Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.

E. Testing Requirements

1. Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.

F. Miscellaneous Requirements

1. Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Splash fill drumming line for filling totes and pails, consisting of a drumming station, hard and flexible piping and electric pumps.	OAC Rule 3745-31-05(A)(3)	Compliance with the special terms and conditions of this permit and with the Ohio Air Toxics Policy. The Permittee shall use splash filling for small containers and high viscosity material (like polymeric Resins)
	OAC rule 3745-15-07	See 2.a Below
	OAC Rule 3745-35-07	Facility-wide emissions shall be limited to: 49.9 TPY organic materials, 24.9 TPY hazardous air pollutants, and 9.9 TPY any single HAP, Based on a rolling 12-month summation.

2. Additional Terms and Conditions

- 2.a Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.

Ashla

PTI A

To be entered upon final issuance

Emissions Unit ID: **P010**

B. Operational Restrictions

1. Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.

D. Reporting Requirements

1. Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.

E. Testing Requirements

1. Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.

F. Miscellaneous Requirements

1. Compliance shall be demonstrated by meeting the terms of emissions unit P008 of this permit.