



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: 16-02118**

**DATE: 5/22/2001**

Ashland Inc  
H Chuck Cooper  
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 or 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 **\$400** 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

ARAQMD



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 16-02118**

Application Number: 16-02118  
APS Premise Number: 1677130036  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Ashland Inc  
Person to Contact: H Chuck Cooper  
Address: 5200 Blazer Parkway  
Dublin, OH 43017

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**1610 E Highland Rd  
Twinsburg, Ohio**

Description of proposed emissions unit(s):  
**Container Filling Line.**

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

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Director

Ashland Inc  
PTI Application: 16-02118  
Issued: To be entered upon final issuance

Facility ID: 1677130036

## 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

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

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

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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 cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new

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or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

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

#### 14. Construction Compliance Certification

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

#### 15. Fees

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

#### B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Organic Materials	49.9
Hazardous Air Pollutants	24.9
Any Single HAP	9.9

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 Issue

Facility ID: 1677130036

Emissions Unit ID: P011

## 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>
P011 - Small Container Fill Line	OAC Rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G(2) and 3745-35-07.
		9.7 pounds per day and 1.77 tons per year. See 2.c below. Compliance with the special terms and conditions of this permit and with the Ohio Air Toxics Policy.
	OAC Rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	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. Additional Terms and Conditions

- 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

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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.
- 2.c** Emissions limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

**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 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 Record keeping 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.

**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

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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 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.
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 HAPs, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by March 15 of each year and shall cover the previous calendar year's activities. This annual reporting date shall override the dates established, for reporting in the two previous permits to install for this facility, PTI 16-1840 and PTI 16-1986.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in PTI #16-02118 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.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule

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3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 (or an equivalent OEPA-approved) model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

Emission unit number:	P011*
Pollutant:	Methylene Chloride
TLV (ug/m3):	174
Maximum Hourly Emission Rate (lbs/hr):	25.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):	5.1
MAGLC (ug/m3):	17.4

\* P011 and P001 share a common stack and were modeled together.

Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a

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permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and

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- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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SIC CODE 5169 SCC CODE 4-08-999-99 EMISSIONS UNIT ID P011  
 EMISSIONS UNIT DESCRIPTION Small Container Fill Line

DATE INSTALLED 3/2001

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment	9.7	49.9	9.7	49.9
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**  
**Compliance with the terms and conditions of this permit to install.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes  
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? ISC screen YES x NO

IDENTIFY THE AIR CONTAMINANTS: various, methylene chloride was modeled representing the worst case scenario.

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to [airpti@epa.state.oh.us](mailto:airpti@epa.state.oh.us)

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	Electronic	Additional information File Name Convention (your PTI # plus this letter)	Hard Copy	None
<u>Calculations (required)</u>	<input type="checkbox"/>	0000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	0000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

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Please complete (see comment bubble to the left for additional instructions):

**NSR Discussion**

This emissions unit would be considered de-minimis if considered on its own this PTI is to ensure these emissions are counted against the facility wide emission limitations already in place under PTIs 16-1840 and 16-1986.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

**Synthetic Minor Determination and/or**  **Netting Determination**  
 Permit To Install **ENTER PTI NUMBER HERE**

**A. Source Description**

Ashland is proposing an annual facility-wide emissions cap of 49.9 tons VOC per year, 24.9 tons combined HAPs per year, and 9.9 tons of any single HAP per year. Furthermore, Ashland is proposing to demonstrate compliance with this emissions limit through the use of monthly emissions records. These records will consist of the following:

- Monthly emission summaries organized by operation for each chemical including emission factor
- Monthly summaries of facility-wide emissions of each chemical emission factor
- Rolling 12-month summations of facility-wide emissions of each chemical

Ashland is proposing that there be no limits on chemical throughput or hours of operation, save those that pertain to the Ohio Air Toxics Policy. Because of the wide variety of chemicals with widely varying vapor pressures, chemical throughput does not directly correspond to chemical emissions. For example, loading 100,000 gallons of ethylene glycol into drums using splash fill would result in 0.27 pounds of emissions, whereas the same operation using n-hexane would result in 727.5 pounds of emissions. Throughput restrictions are just not meaningful for our operations and do not correlate to emissions or air quality.

Ashland has developed this compliance demonstration methodology based on our unique business needs and on a guidance document titled "Synthetic Minor Permit Guidance Document" authored by Tom Rigo on November 30, 1994. Regarding restrictions appearing in a synthetic minor permit, this guidance document states:

"These restrictions should be designed so that an inspector on any given day (or greater time period up to a month if daily is technically or economically infeasible) can establish that the restricted potential to emit will not exceed the major classification threshold."

The guidance goes on to cite USEPA guidance which states

"The restriction cannot be longer than monthly unless we establish a rolling 365 day or rolling monthly restriction. If a monthly rolling restriction is preferred, you must prove that daily records are technically infeasible or economically unreasonable."

Due to the complexities of our business, the requirement to keep daily emissions records is both technically infeasible and economically unreasonable. Therefore, Ashland qualifies for rolling 12-month rolling instead of 365-day rolling compliance demonstration for the following reasons:

**B. Facility Emissions and Attainment Status**

In order to track the location and quantity of each of these 19,000 different products, Ashland has developed a computerized

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inventory system which tracks the movement of chemicals from place to place at each plant site.

Monthly, the Environmental Health & Safety Department receives a download of raw data from this inventory system. This massive file is then uploaded into a Microsoft Access database called AACIS (Ashland Air Compliance Information System). We then use AACIS to manipulate the chemical throughput data to generate a monthly report for each facility that shows the identity of each chemical species that has moved through each plant and the emissions that were generated at each step, e.g., storage tanks, drumming, blending, etc. Emission estimates are generated based on USEPA approved methodology.

AACIS also stores historic emissions data and can generate historic monthly emissions reports and rolling 12-month emissions reports. These rolling 12-month reports are generated each month, the emissions are compared with permitted limits, and reports are sent out to the facilities to keep in their records. An example 12-month emissions report is attached.

Ashland invested close to \$100,000.00 and a significant amount of time to develop this emissions tracking system and we currently employ three contractors whose full time jobs are to generate monthly and annual emissions reports for our chemical distribution facilities. In order to change our system to track daily emissions Ashland would have to, essentially, start from scratch and develop a completely new emissions inventory system at significant cost of dollars and human resources.

Ashland has a state-of-the-art computerized emissions tracking system that does an excellent job of demonstrating continuous compliance with federally enforceable emissions limits at nearly 60 distribution facilities nationwide. In fact, we currently hold many federally enforceable permits that contain only monthly and rolling 12-month emissions limits, including permits for facilities in Ohio, Indiana, Michigan, and Wisconsin. We have every confidence that we can maintain and adequately demonstrate continuous compliance with the proposed facility-wide emissions cap at our Twinsburg, Ohio facility.

### **C. Source Emissions**

Ashland is in the business of, and has equipment on hand to

- purchasing bulk chemicals,
- mixing some of these chemicals into blends based on customer specifications,
- repackaging these products into pails, drums, and totes, and
- redistributing these products to our customers on demand.

### **D. Conclusion**

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We expect that our actual annual emissions will be well below the proposed emissions caps. Therefore, there is no compelling reason to require that we keep a running daily total of our emissions. For example, at the Twinsburg Bulk Facility our annual emissions from 12/98 to 11/99 were only 12.65 tons per year, compared to an annual emissions limit of 49.9 tons per year, and for the same period our emissions of combined HAPs was only 3.3 tons.

**PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:**

NONE

Please complete:

<b>SUMMARY (for informational purposes only)</b>	
<b>TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS</b>	
<u>Pollutant</u>	<u>Tons Per Year</u>
Organic Materials	49.9
Hazardous Air Pollutants	24.9
Any Single HAP	9.9

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