

Facility ID: 1652050184 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit B001](#)
- [Go to Part II for Emissions Unit B002](#)
- [Go to Part II for Emissions Unit J001](#)
- [Go to Part II for Emissions Unit P001](#)
- [Go to Part II for Emissions Unit P002](#)
- [Go to Part II for Emissions Unit P003](#)
- [Go to Part II for Emissions Unit P801](#)
- [Go to Part II for Emissions Unit T001](#)
- [Go to Part II for Emissions Unit T002](#)

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1652050184 Emissions Unit ID: B001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Boiler no. 1 - 23.3 MMBtu/hr, fired by natural gas, uncontrolled	OAC rule 3745-31-05(A)(3) (PTI 16-02336)	0.18 pound of particulate emissions (PE) per hour
		0.78 ton of PE per year
		0.01 pound of sulfur dioxide (SO2) per hour
		0.06 ton of SO2 per year
		0.13 pound of volatile organic compounds (VOC) per hour
		0.56 ton of VOC per year
		2.33 pounds of nitrogen oxides (NOx) per hour
		10.21 tons of NOx per year
		1.96 pounds of carbon monoxide (CO) per hour
		8.57 tons of CO per year
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
		Visible particulate emissions (PE) shall not exceed 20% opacity as a six-minute average, except as specified by rule.
		See A.2.b
	OAC rule 3745-17-07(A)(1)	See A.2.b
		See A.2.c

40 CFR Part 60 Subpart Dc

OAC rule 3745-18-06

OAC rule 3745-23-06(B)

**2. Additional Terms and Conditions**

- (a) The above hourly mass emission limitations (regulated under OAC rule 3745-31-05) for particulate matter, nitrogen oxides, sulfur oxides, carbon monoxide, and VOC are based upon the potential to emit of this emissions unit. Therefore, no recordkeeping, reporting, nor emissions calculations are required with these limitations.  
The emission limits established by this rule are less stringent than the limits established by OAC rule 3745-31-05(A)(3).  
The permittee has satisfied the "latest available control techniques and operating practices" require pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 16-02336.

**B. Operational Restrictions**

1. This emissions unit shall only be fired with natural gas.
2. The permittee shall properly adjust, operate, and maintain the emissions unit covered under this permit in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

**C. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall record and maintain records of the amounts of each fuel combusted during each day.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit initial notifications in accordance with the provisions of 40 CFR Part 60, Subpart Dc for this emissions unit.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):  
Emission Limitation

0.18 pound of particulate emissions (PE) per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

The short term emission limitation was developed by multiplying the maximum heat input rating provided by the applicant (23.3 million Btu of heat input per hour) by the PE emission factor from the AP-42, Fifth Edition, published January 1995, Section 1.4, Supplement D, published July 1998, Table 1.4-2 (7.6 pounds of PE per million standard cubic feet), and dividing by 1000 million Btu per million standard cubic feet.

Emission Limitation

0.78 ton of PE per year

Applicable Compliance Method

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation

0.01 pound of sulfur dioxide (SO<sub>2</sub>) per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

The short term emission limitation was developed by multiplying the maximum heat input rating provided by the applicant (23.3 million Btu of heat input per hour) by the SO<sub>2</sub> emission factor from the AP-42, Fifth Edition, published January 1995, Section 1.4, Supplement D, published July 1998, Table 1.4-2 (0.6 pounds of SO<sub>2</sub> per million standard cubic feet), and dividing by 1000 million Btu per million standard cubic feet.

Emission Limitation

0.06 ton of SO<sub>2</sub> per year

Applicable Compliance Method

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation

0.13 pound of volatile organic compounds (VOC) per hour

**Applicable Compliance Method**

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

The short term emission limitation was developed by multiplying the maximum heat input rating provided by the applicant (23.3 million Btu of heat input per hour) by the VOC emission factor from the AP-42, Fifth Edition, published January 1995, Section 1.4, Supplement D, published July 1998, Table 1.4-2 (5.5 pounds of VOC per million standard cubic feet), and dividing by 1000 million Btu per million standard cubic feet.

Emission Limitation

0.56 ton of VOC per year

**Applicable Compliance Method**

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation

2.33 pounds of nitrogen oxides (NOx) per hour

**Applicable Compliance Method**

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

The short term emission limitation was developed by multiplying the maximum heat input rating provided by the applicant (23.3 million Btu of heat input per hour) by the NOx emission factor from the AP-42, Fifth Edition, published January 1995, Section 1.4, Supplement D, published July 1998, Table 1.4-1 (100 pounds of NOx per million standard cubic feet), and dividing by 1000 million Btu per million standard cubic feet.

Emission Limitation

10.21 tons of NOx per year

**Applicable Compliance Method**

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation

1.96 pounds of carbon monoxide (CO) per hour

**Applicable Compliance Method**

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

The short term emission limitation was developed by multiplying the maximum heat input rating provided by the applicant (23.3 million Btu of heat input per hour) by the CO emission factor from the AP-42, Fifth Edition, published January 1995, Section 1.4, Supplement D, published July 1998, Table 1.4-1 (84 pounds of CO per million standard cubic feet), and dividing by 1000 million Btu per million standard cubic feet.

Emission Limitation

8.57 tons of CO per year

**Applicable Compliance Method**

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation

Visible particulate emissions (PE) shall not exceed 20% opacity as a six-minute average, except as specified by rule.

**Applicable Compliance Method**

If required, compliance with the emission limits for visible emissions as established in OAC rule 3745-17-07(A) (1) shall be demonstrated by methods outlined in OAC rule 3745-17-03(B)(1).

**F. Miscellaneous Requirements****1. NSPS Requirements**

This emissions unit is subject to Subpart Dc of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirements to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
 DAPC - Permit Management Unit  
 Lazarus Government Center  
 P.O. Box 1049  
 Columbus, OH 43216-1049

and Akron Regional Air Quality Management District  
 146 South High Street, Suite 904  
 Akron, OH 44308

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1652050184 Emissions Unit ID: B002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Boiler no. 2 - 23.3 MMBtu/hr, fired by natural gas, uncontrolled	OAC rule 3745-31-05(A)(3) (PTI 16-02336)	0.18 pound of particulate emissions (PE) per hour
		0.78 ton of PE per year
		0.01 pound of sulfur dioxide (SO2) per hour
		0.06 ton of SO2 per year
		0.13 pound of volatile organic compounds (VOC) per hour
		0.56 ton of VOC per year
		2.33 pounds of nitrogen oxides (NOx) per hour
		10.21 tons of NOx per year
		1.96 pounds of carbon monoxide (CO) per hour
		8.57 tons of CO per year
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
		Visible particulate emissions (PE) shall not exceed 20% opacity as a six-minute average, except as specified by rule.
		See A.2.b
	OAC rule 3745-17-07(A)(1)	See A.2.b
		See A.2.c

40 CFR Part 60 Subpart Dc

OAC rule 3745-18-06

OAC rule 3745-23-06(B)

**2. Additional Terms and Conditions**

- (a) The above hourly mass emission limitations (regulated under OAC rule 3745-31-05) for particulate matter, nitrogen oxides, sulfur oxides, carbon monoxide, and VOC are based upon the potential to emit of this emissions unit. Therefore, no recordkeeping, reporting, nor emissions calculations are required with these limitations.  
The emission limits established by this rule are less stringent than the limits established by OAC rule 3745-31-05(A)(3).  
The permittee has satisfied the "latest available control techniques and operating practices" require pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 16-02336.

**B. Operational Restrictions**

1. This emissions unit shall only be fired with natural gas.
2. The permittee shall properly adjust, operate, and maintain the emissions unit covered under this permit in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

**C. Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall record and maintain records of the amounts of each fuel combusted during each day.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit initial notifications in accordance with the provisions of 40 CFR Part 60, Subpart Dc for this emissions unit.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation

0.18 pound of particulate emissions (PE) per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

The short term emission limitation was developed by multiplying the maximum heat input rating provided by the applicant (23.3 million Btu of heat input per hour) by the PE emission factor from the AP-42, Fifth Edition, published January 1995, Section 1.4, Supplement D, published July 1998, Table 1.4-2 (7.6 pounds of PE per million standard cubic feet), and dividing by 1000 million Btu per million standard cubic feet.

Emission Limitation

0.78 ton of PE per year

Applicable Compliance Method

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation

0.01 pound of sulfur dioxide (SO<sub>2</sub>) per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

The short term emission limitation was developed by multiplying the maximum heat input rating provided by the applicant (23.3 million Btu of heat input per hour) by the SO<sub>2</sub> emission factor from the AP-42, Fifth Edition, published January 1995, Section 1.4, Supplement D, published July 1998, Table 1.4-2 (0.6 pounds of SO<sub>2</sub> per million standard cubic feet), and dividing by 1000 million Btu per million standard cubic feet.

Emission Limitation

0.06 ton of SO<sub>2</sub> per year

Applicable Compliance Method

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation

0.13 pound of volatile organic compounds (VOC) per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

The short term emission limitation was developed by multiplying the maximum heat input rating provided by the applicant (23.3 million Btu of heat input per hour) by the VOC emission factor from the AP-42, Fifth Edition, published January 1995, Section 1.4, Supplement D, published July 1998, Table 1.4-2 (5.5 pounds of VOC per million standard cubic feet), and dividing by 1000 million Btu per million standard cubic feet.

Emission Limitation

0.56 ton of VOC per year

Applicable Compliance Method

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation

2.33 pounds of nitrogen oxides (NOx) per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

The short term emission limitation was developed by multiplying the maximum heat input rating provided by the applicant (23.3 million Btu of heat input per hour) by the NOx emission factor from the AP-42, Fifth Edition, published January 1995, Section 1.4, Supplement D, published July 1998, Table 1.4-1 (100 pounds of NOx per million standard cubic feet), and dividing by 1000 million Btu per million standard cubic feet.

Emission Limitation

10.21 tons of NOx per year

Applicable Compliance Method

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation

1.96 pounds of carbon monoxide (CO) per hour

Applicable Compliance Method

Compliance shall be demonstrated based upon the emissions unit's potential to emit:

The short term emission limitation was developed by multiplying the maximum heat input rating provided by the applicant (23.3 million Btu of heat input per hour) by the CO emission factor from the AP-42, Fifth Edition, published January 1995, Section 1.4, Supplement D, published July 1998, Table 1.4-1 (84 pounds of CO per million standard cubic feet), and dividing by 1000 million Btu per million standard cubic feet.

Emission Limitation

8.57 tons of CO per year

Applicable Compliance Method

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

Emission Limitation

Visible particulate emissions (PE) shall not exceed 20% opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance with the emission limits for visible emissions as established in OAC rule 3745-17-07(A) (1) shall be demonstrated by methods outlined in OAC rule 3745-17-03(B)(1).

**F. Miscellaneous Requirements**

1. NSPS Requirements

This emissions unit is subject to Subpart Dc of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirements to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);

- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
 DAPC - Permit Management Unit  
 Lazarus Government Center  
 P.O. Box 1049  
 Columbus, OH 43216-1049

and Akron Regional Air Quality Management District  
 146 South High Street, Suite 904  
 Akron, OH 44308

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1652050184 Emissions Unit ID: J001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Railcar and Tanker Truck Loading Rack for bottom loading of a blend of ethanol and a denaturant (gasoline or any other material with a vapor pressure equal to or less than gasoline) in two bays, controlled by a vapor balance system, with a loading capacity of 15,000 gallons per hour	OAC rule 3745-31-05(A)(3) (PTI 16-02365)	20.25 pounds of volatile organic compounds (VOC) per hour, 2.09 tons of VOC per year  See A.2.a through A.2.d below.

**2. Additional Terms and Conditions**

- (a) The annual throughput of this emissions unit, and the facility processing rate, is physically constrained by the maximum capacity of the final distillation process, P003. The design production rate for the final distillation process is 6 million gallons per year, therefore the PTE and annual permit limits for this emissions unit are based upon this rate. No material other than denatured alcohol shall be fed to J001. For any transfer of gasoline from a loading rack to a delivery vessel, the vapors displaced from the delivery vessel shall be processed by a vapor balance system which is equipped with a vapor tight vapor line from the delivery vessel to the stationary storage tank being unloaded and a means to ensure that the vapor line is connected before gasoline can be transferred and which is designed and operated to route at least 90 percent by weight of the VOC in the displaced vapors to the stationary storage tank. Any loading rack which transfers gasoline to a delivery vessel shall be equipped for top submerged filling or bottom filling for the transfer of gasoline. All gasoline loading lines, unloading lines and vapor lines shall be equipped with fittings which are vapor tight.

**B. Operational Restrictions**

- 1. A means shall be provided to prevent drainage of product from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- 2. All product loading lines shall be equipped with fittings which are vapor tight.
- 3. The permittee shall not permit product to be spilled, discarded in sewers, stored in open containers or handled in any other manner that would result in evaporation.

4. The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of gasoline.
5. The delivery vessel hatches shall be closed at all times during the loading of the delivery vessel.
6. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.
7. There shall be no leaks in the vapor and liquid lines during the transfer of gasoline.
8. The pressure relief valves on the stationary storage tanks and delivery vessels shall be set to release at no less than 0.7 pound per square inch gauge or the highest possible pressure (in accordance with State or local fire codes, or the "National Fire Prevention Association" guidelines).
9. The permittee shall repair within 15 days any leak from the vapor balance system or vapor control system, which is employed to meet the requirements of paragraph (P)(1) of OAC rule 3745-21-09, when such leak is equal to or greater than 100 percent of the lower explosive limit as propane, as determined under paragraph (K) of OAC rule 3745-21-10.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall record the annual throughput, in gallons per year.
2. The permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:
  - a. Date of inspection.
  - b. Findings (may indicate no leaks discovered or location, nature, and severity of each leak).
  - c. Leak determination method.
  - d. Corrective action (date each leak repaired and reasons for any repair interval in excess of 15 calendar days).
  - e. Inspector's name and signature.

3. The permit to install for this emissions unit (J001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethanol

TLV (mg/m3): 1,884

Maximum Hourly Emission Rate (lbs/hr): 12.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 18,474

MAGLC (ug/m3): 44,863

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of 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 report any exceedances of the 6,000,000 gallon per year, annual throughput limitation.
2. Any leak from the vapor balance system or vapor control system that is not repaired within 15 days after identification shall be reported to the Director within 30 days after the repair is completed.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):  
Emission Limitation:

20.25 pounds VOC per hour

Applicable Compliance Method:

The short term emission limitation is the sum of the short term limit of VOC emission from ethanol and the short term limit of VOC emission from gasoline, with gasoline making up 5% of the maximum ethanol loading rate.

The short term emission limitation for ethanol was developed by multiplying 95% of the sum of the maximum hourly rate of railcar and tanker truck loading (both are 15,000 gallons of ethanol per hour) by the controlled ethanol emission factor from the AP-42, Fifth Edition, published January 1995, Section 5.2 (0.43 pounds per thousand gallons), and dividing by 1000 gallons.

The short term emission limitation for gasoline was developed by multiplying 5% of the sum of the maximum hourly rate of railcar and tanker truck loading (both are 15,000 gallons of ethanol per hour) by the controlled ethanol emission factor from the AP-42, Fifth Edition, published January 1995, Section 5.2 (5.26 pounds per thousand gallons), and dividing by 1000 gallons.

Emission Limitation:

2.09 tons of VOC per year

Applicable Compliance Method:

The tons per year limitation is the sum of the annual limit of VOC emission from ethanol and the annual limit of VOC emission from gasoline, with gasoline making up 5% of the maximum ethanol loading rate.

The tons per year limitation for ethanol was developed by multiplying the maximum annual rate of railcar and tanker truck loading (6,000,000 gallons of ethanol per year) by the controlled ethanol emission factor from the AP-42, Fifth Edition, published January 1995, Section 5.2 (4.3 pounds per thousand gallons), and dividing by the product of 1000 gallons and 2000 pounds per ton.

The tons per year limitation for gasoline was developed by multiplying the maximum annual rate of railcar and tanker truck loading (5% of 6,000,000 gallons of ethanol per year) by the controlled ethanol emission factor from the AP-42, Fifth Edition, published January 1995, Section 5.2 (5.26 pounds per thousand gallons), and dividing by the product of 1000 gallons and 2000 pounds per ton.

**F. Miscellaneous Requirements**

1. The terms and conditions of this emissions unit of this PTI supersede the requirements of PTI 16-02336, issued on April 27, 2004 for emissions unit J001.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1652050184 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Flash Evaporator No. 1 - for the preliminary removal of water from the raffinate, uncontrolled	OAC rule 3745-31-05(A)(3) (PTI 16-02336)	0.0012 pound of volatile organic compounds (VOC) per hour, 0.0052 ton of VOC per year
	40 CFR Part 60 Subpart NNN	See A.2.a
<b>2. Additional Terms and Conditions</b>		
<ul style="list-style-type: none"> <li>(a) Except as provided by rule, the permittee shall reduce emissions of VOC (less methane and ethane) by 98 weight-percent, or to a VOC (less methane and ethane) concentration of 20 ppmv, on a dry basis corrected to 3 percent oxygen, whichever is less stringent.</li> </ul>		
<b>B. Operational Restrictions</b>		
<ul style="list-style-type: none"> <li>1. None</li> </ul>		
<b>C. Monitoring and/or Record Keeping Requirements</b>		
<ul style="list-style-type: none"> <li>1. The permittee shall comply with the following recordkeeping requirements for this emissions unit: <ul style="list-style-type: none"> <li>a. The permittee shall comply with the recordkeeping requirements contained in 40 CFR Part 60 Subpart NNN.</li> </ul> </li> </ul>		
<b>D. Reporting Requirements</b>		
<ul style="list-style-type: none"> <li>1. The permittee shall comply with the following reporting requirements for this emissions unit: <ul style="list-style-type: none"> <li>a. all reporting shall comply with the requirements contained in 40 CFR Part 60 Subpart NNN.</li> </ul> </li> <li>2. The permittee shall submit initial notifications in accordance with the provisions of 40 CFR Part 60, Subpart NNN for this emissions unit.</li> </ul>		
<b>E. Testing Requirements</b>		
<ul style="list-style-type: none"> <li>1. Compliance with the emission limitation(s) in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s): <p>Emission Limitation:</p> <p>0.0012 pound of volatile organic compounds (VOC) per hour</p> <p>Applicable Compliance Method:</p> <p>Compliance shall be determined based on information provided by the applicant. The short term maximum emission rate for ethanol emission is calculated by multiplying the maximum ethanol concentration in a vacuum system (20 ppm) by the product of the molecular weight of ethanol (46 pounds per pound-mole) and the maximum flow rate through the vacuum system (500 cubic feet per hour), and dividing by the product of 385 cubic feet per pound-mole times 1,000,000.</p> <p>Emission Limitation:</p> <p>0.0052 ton of VOC per year</p> <p>Applicable Compliance Method:</p> <p>The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.</p> </li> </ul>		
<b>F. Miscellaneous Requirements</b>		
<ul style="list-style-type: none"> <li>1. NSPS Requirements <p>This emissions unit is subject to Subpart NNN of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.</p> <p>The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.</p> <p>Pursuant to the NSPS, the source owner/operator is hereby advised of the requirements to report the following at the appropriate times:</p> <ul style="list-style-type: none"> <li>a. construction date (no later than 30 days after such date);</li> <li>b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);</li> <li>c. actual start-up date (within 15 days after such date); and</li> <li>d. date of performance testing (if required, at least 30 days prior to testing).</li> </ul> <p>Reports are to be sent to:</p> <p>Ohio Environmental Protection Agency DAPC - Permit Management Unit Lazarus Government Center P.O. Box 1049 Columbus, OH 43216-1049</p> <p>and Akron Regional Air Quality Management District 146 South High Street, Suite 904 Akron, OH 44308</p> </li> </ul>		

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1652050184 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Flash Evaporator No. 2 - for the preliminary removal of water from the raffinate, uncontrolled	OAC rule 3745-31-05(A)(3) (PTI 16-02336)	0.0012 pound of volatile organic compounds (VOC) per hour, 0.0052 ton of VOC per year
	40 CFR Part 60 Subpart NNN	See A.2.a

**2. Additional Terms and Conditions**

- (a) Except as provided by rule, the permittee shall reduce emissions of VOC (less methane and ethane) by 98 weight-percent, or to a VOC (less methane and ethane) concentration of 20 ppmv, on a dry basis corrected to 3 percent oxygen, whichever is less stringent.

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall comply with the following recordkeeping requirements for this emissions unit:
  - a. The permittee shall comply with the recordkeeping requirements contained in 40 CFR Part 60 Subpart NNN.

**D. Reporting Requirements**

1. The permittee shall comply with the following reporting requirements for this emissions unit:
  - a. all reporting shall comply with the requirements contained in 40 CFR Part 60 Subpart NNN.
2. The permittee shall submit initial notifications in accordance with the provisions of 40 CFR Part 60, Subpart NNN for this emissions unit.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 

Emission Limitation:

0.0012 pound of volatile organic compounds (VOC) per hour

Applicable Compliance Method:

Compliance shall be determined based on information provided by the applicant. The short term maximum emission rate for ethanol emission is calculated by multiplying the maximum ethanol concentration in a vacuum system (20 ppm) by the product of the molecular weight of ethanol (46 pounds per pound-mole) and the maximum flow rate through the vacuum system (500 cubic feet per hour), and dividing by the product of 385 cubic feet per pound-mole times 1,000,000.

Emission Limitation:

0.0052 ton of VOC per year

Applicable Compliance Method:

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided

compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

**F. Miscellaneous Requirements**

1. NSPS Requirements

This emissions unit is subject to Subpart NNN of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirements to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
 DAPC - Permit Management Unit  
 Lazarus Government Center  
 P.O. Box 1049  
 Columbus, OH 43216-1049

and Akron Regional Air Quality Management District  
 146 South High Street, Suite 904  
 Akron, OH 44308

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1652050184 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate**

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Final Distillation Process (two distillation columns, one condenser and one molecular sieve (formerly referred to as the dehydrator)) - to convert 25 percent ethanol to 98 percent ethanol, uncontrolled, with a production capacity of 6,000,000 gallons per year	OAC rule 3745-31-05(A)(3) (PTI 16-02336)  40 CFR Part 60 Subpart NNN	0.0012 pound of volatile organic compounds (VOC) per hour, 0.0052 ton of VOC per year  See A.2.a

2. **Additional Terms and Conditions**

- (a) Except as provided by rule, the permittee shall reduce emissions of VOC (less methane and ethane) by 98 weight-percent, or to a VOC (less methane and ethane) concentration of 20 ppmv, on a dry basis corrected to 3 percent oxygen, whichever is less stringent.

**B. Operational Restrictions**

- 1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall comply with the following recordkeeping requirements for this emissions unit:
  - a. The permittee shall comply with the recordkeeping requirements contained in 40 CFR Part 60 Subpart NNN.
- D. **Reporting Requirements**
  1. The permittee shall comply with the following reporting requirements for this emissions unit:
    - a. all reporting shall comply with the requirements contained in 40 CFR Part 60 Subpart NNN.
  2. The permittee shall submit initial notifications in accordance with the provisions of 40 CFR Part 60, Subpart NNN for this emissions unit.
- E. **Testing Requirements**
  1. Compliance with the emission limitation(s) in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 

Emission Limitation:

0.0012 pound of volatile organic compounds (VOC) per hour

Applicable Compliance Method:

Compliance shall be determined based on information provided by the applicant. The short term maximum emission rate for ethanol emission is calculated by multiplying the maximum ethanol concentration in a vacuum system (20 ppm) by the product of the molecular weight of ethanol (46 pounds per pound-mole) and the maximum flow rate through the vacuum system (500 cubic feet per hour), and dividing by the product of 385 cubic feet per pound-mole times 1,000,000.

Emission Limitation:

0.0052 ton of VOC per year

Applicable Compliance Method:

The tons per year limitation was developed by multiplying the pounds per hour limitation by the maximum operating schedule of 8760 hours per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.
- F. **Miscellaneous Requirements**
  1. NSPS Requirements
 

This emissions unit is subject to Subpart NNN of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirements to report the following at the appropriate times:

    - a. construction date (no later than 30 days after such date);
    - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
    - c. actual start-up date (within 15 days after such date); and
    - d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
 DAPC - Permit Management Unit  
 Lazarus Government Center  
 P.O. Box 1049  
 Columbus, OH 43216-1049

and Akron Regional Air Quality Management District  
 146 South High Street, Suite 904  
 Akron, OH 44308

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1652050184 Emissions Unit ID: P801 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

#### Part II - Special Terms and Conditions

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

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

- (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Non-Potable Ethanol Manufacturing Facility for Processing of Non-Hazardous Liquid Wastes into Fuel Grade Ethanol (>99.8 percent by volume) by Removal of Carbonation through Flash Evaporators, Final Distillation, and Loading into Railcars or Tanker Trucks	OAC rule 3745-31-05(A)(3) (PTI16-02336)	19.2 tons of fugitive volatile organic compounds (VOC) per year
		See A.2.b
	OAC rule 3745-21-09(DD)	See A.2.a
	40 CFR Part 60 Subpart VV	See A.2.a

**2. Additional Terms and Conditions**

- (a) The permittee shall include the appropriate process equipment and regulated components for this emission unit in the current site fugitive leak detection and repair (LDAR) program. The LDAR program shall comply with the appropriate provisions (includes operational restrictions, monitoring and recordkeeping, reporting, and testing) of OAC rule 3745-21-09(DD), leaks from process units that produce organic chemicals, and 40 CFR Part 60 Subpart VV (Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.)  
The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09 (DD) and 40 CFR Part 60 Subpart VV.

**B. Operational Restrictions**

- 1. The permittee shall comply with the LDAR program operational restrictions, see A.2.a.

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall comply with the following recordkeeping requirements for this emissions unit:
  - a. The permittee shall comply with the recordkeeping requirements contained in OAC rule 3745-21-09(DD).
  - b. The permittee shall comply with the LDAR program monitoring and recordkeeping requirements, see A.2.a.

**D. Reporting Requirements**

- 1. The permittee shall comply with the following reporting requirements for this emissions unit:
  - a. all reporting shall comply with the requirements contained in OAC rule 3745-21-09(DD).
- 2. The permittee shall comply with the LDAR program reporting requirements, see A.2.a.

**E. Testing Requirements**

- 1. Compliance with the emission limitation(s) in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
19.2 tons of fugitive volatile organic compounds (VOC) per year  
  
Applicable Compliance Method:  
  
The VOC emissions from fugitive emissions (i.e., valves, flanges, open ended lines, and pumps) shall be determined using EPA-453/R-95-017, "Protocol for Equipment Leak Emission Estimates."
- 2. The permittee shall comply with the LDAR program testing requirements, see A.2.a.

**F. Miscellaneous Requirements**

- 1. NSPS Requirements  
  
This emissions unit is subject to Subpart VV of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.  
  
The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.  
  
Pursuant to the NSPS, the source owner/operator is hereby advised of the requirements to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);
  - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
 DAPC - Permit Management Unit  
 Lazarus Government Center  
 P.O. Box 1049  
 Columbus, OH 43216-1049

and Akron Regional Air Quality Management District  
 146 South High Street, Suite 904  
 Akron, OH 44308

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1652050184 Emissions Unit ID: T001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Storage Tank number 1 - 19,815 gallon vertical fixed roof steel tank storing gasoline or any other denaturant with a vapor pressure less than or equal to gasoline	OAC rule 3745-31-05(A)(3) (PTI 16-02365) OAC rule 3745-21-09(L)	2.39 tons of organic compounds (OC)/year exempt (see A.2.a below)

- 2. **Additional Terms and Conditions**
  - (a) In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

**B. Operational Restrictions**

- 1. None

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permit to install for this emissions unit (T001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethanol

TLV (mg/m3): 1,884

Maximum Hourly Emission Rate (lbs/hr): 12.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 18,474

MAGLC (ug/m3): 44,863

Physical changes to or changes in the method of operation of the emissions unit after its installation or

modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of 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. None

**E. Testing Requirements**

1. Compliance with the annual organic compound (OC) emission limit in Section A.1. of these terms and conditions shall be calculated as the sum of the OC emissions from all gasoline storage tank filling and dispensing operations. This calculation shall be based on the annual gasoline throughput for the facility using the calculation below.
  - a. Emission Limitation:
 

2.39 tons of organic compounds (OC)/year

Applicable Compliance Method:

Add the working loss and breathing loss calculated by the Tanks 4.0 program and divide by 2000 pounds/ton.

**F. Miscellaneous Requirements**

1. None

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1652050184 Emissions Unit ID: T002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or

control measures (if any) may 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>
Storage Tank number 2 - 19,815 gallon vertical fixed roof steel tank storing gasoline or any other denaturant with a vapor pressure less than or equal to gasoline	OAC rule 3745-31-05(A)(3) (PTI 16-02365) OAC rule 3745-21-09(L)	2.39 tons of organic compounds (OC)/year exempt (see A.2.a below)

2. **Additional Terms and Conditions**

- (a) In accordance with OAC rule 3745-21-09(L)(2), this storage tank is exempt from the requirements of OAC rule 3745-21-09(L)(1) because the tank has a capacity of less than 40,000 gallons.

B. **Operational Restrictions**

- 1. None

C. **Monitoring and/or Record Keeping Requirements**

- 1. The permit to install for this emissions unit (T001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethanol

TLV (mg/m3): 1,884

Maximum Hourly Emission Rate (lbs/hr): 12.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 18,474

MAGLC (ug/m3): 44,863

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of 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. None

E. **Testing Requirements**

- 1. Compliance with the annual organic compound (OC) emission limit in Section A.1. of these terms and conditions shall be calculated as the sum of the OC emissions from all gasoline storage tank filling and dispensing operations. This calculation shall be based on the annual gasoline throughput for the facility using the calculation below.

- a. Emission Limitation:

2.39 tons of organic compounds (OC)/year

Applicable Compliance Method:

Add the working loss and breathing loss calculated by the Tanks 4.0 program and divide by 2000 pounds/ton.

F. **Miscellaneous Requirements**

1. None