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Facility Name: **Matrix Essentials Inc**

Application Number: **13-3154**

Date: **May 12, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Matrix Essentials Inc** located in **Cuyahoga** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

	T001		12,000 gallon Ethanol underground storage tank	
<u>Ohio EPA Source Number</u>		<u>Source Identification Description</u>		<u>BAT Determination</u>
F001	T002	Raw materials weighing area	10,000 gallon Ethanol underground storage tanks	Compliance with the terms and conditions of this permit 2.1 pounds PM/hour 5 percent opacity out of roof vent(s)
P001		Filling of aerosol cans and testing for leaks in a water bath - Line 8		21.17 pounds OC/hour (propellant) use of non-photochemica lly reactive materials only

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3745-21-07

Applicable
Federal &
OAC Rules

3745-31-05
3745-15-07
3745-17-07
3745-17-08

3745-31-05
3745-15-07
3745-21-07

3745-31-05
3745-15-07
3745-21-07
40 CFR 60
Subpart Kb

3745-31-05
3745-15-07

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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Permit
Allowable Mass 1.2 TPY OC
Emissions
and/or
Control/Usage
Requirements

Particulate
Matter:
2.1
pound/hour,
6.0 tons/year;
5 percent
opacity out of
roof vent(s)

Organic
Compounds
(OC):
21.17
pounds/hour
33.42
tons/year
Production of
up to a
maximum of
25,000,000
OC-propellant
filled aerosol
cans per year

1.5 TPY OC

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- * Underground tank with submerged filling, fixed roof and conservation with pressure setting at plus 1 ounce/square inch of vent for each tank. The tank shall not store or handle any material that meets the definition of a "volatile photochemically reactive material" as defined in OAC 3745-21-01 (C) (7) .

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate matter	6.0
Organic compounds	36.1

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
T001	12,000 gallon Ethanol underground storage tank	K _b

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

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Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement 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
P.O. Box 163669
Columbus, OH 43216-3669

and **Cleveland Air Pollution Control**
1925 St. Clair Avenue
Cleveland, OH 44114

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

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In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Cleveland Air Pollution Control, 1925 St. Clair Avenue, Cleveland, OH 44114.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

MISCELLANEOUS STORAGE TANKS

Unless otherwise indicated, BAT for any miscellaneous storage tanks identified within this permit consists of the use of submerged fill into the storage tanks. The submerged fill pipe(s) are to be installed within six (6) inches of the bottom of the storage tank.

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

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<u>Source Number(s)</u>	<u>Tank Size</u>
T001	12,000 gallons
T002	10,000 gallons

In addition,

- A. In accordance with 40 CFR 60.116b(a) and (c), the owner and operator of the, following storage vessel(s) shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. Records shall be retained for a minimum of two years.

<u>Source Number(s)</u>	<u>Tank Size</u>
T001	12,000 gallons
T002	10,000 gallons

- B. In accordance with 40 CFR 60.116b(a) and (d), the owner and operator of the following storage vessel(s) shall notify the local field office within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range. Records shall be retained for a minimum of two years.

<u>Source Number(s)</u>	<u>Tank Size</u>
T001	12,000 gallons
T002	10,000 gallons

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Product & Propellant Filled and Leak Tested Aerosol Can Production Operational Restriction

1. The maximum annual product filled and leak tested aerosol can production for this emissions unit shall not exceed 25,000,000 cans, based upon a rolling,

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12-month summation of the aerosol can production figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the aerosol can production levels specified in the following table:

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<u>Month(s)</u>	<u>Maximum Allowable Production (Number of Cans Tested)</u>	<u>Cumulative Aerosol Can Produced and</u>
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1-2	2,083,333	
1-3	4,166,667	
1-4	6,250,000	
1-5	8,333,333	
1-6	10,416,667	
1-7	12,500,000	
1-8	14,583,333	
1-9	16,666,667	
1-10	18,750,000	
1-11	20,833,000	
1-12	22,916,667	
	25,000,000	

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual aerosol can production limitation shall be based upon a rolling, 12-month summation of the aerosol can production figures.

B. Product & Propellant Filled and Leak Tested Aerosol Can Production Monitoring and Recordkeeping Requirement

1. The permittee shall maintain monthly records of the following information:
 - a. the production rate and the hours of operation for each month; and,
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the aerosol can production and the hours of operation figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative aerosol can production and hours of operation for each calendar month.

C. Product & Propellant Filled and Leak Tested Aerosol Can Production Reporting Requirement

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1. The permittee shall submit annual deviation (excursion) reports which identify the following:
 - a. all exceedances of the rolling, 12-month limitation and, for the first 12 calendar months of operation following the issuance of this permit all exceedances of the maximum allowable cumulative aerosol can production and hours of operation levels; and,
 - b. an identification of each day during which the average hourly organic compound emissions exceeds the 21.17 pounds per hour, and the actual average hourly organic compound emissions for each such day.

D. Testing Requirements and Compliance Methods

1. Compliance with the emission limitations in the Air Emission Summary for emissions unit P001 shall be determined in accordance with the following methods:
 - a. Emission Limitation
OC: 21.17 lbs OC/hour

Applicable Compliance Method

Multiply the calculated Total OC Emission Factor of 0.0026736 lb OC/can of aerosol filled and leak tested by the maximum number of aerosol cans filled and tested per hour.
 - b. Emission Limitation
OC: 33.42 tons OC/year

Multiply 0.0026736 lb OC/can of aerosol filled and leak tested by the maximum number of aerosol cans filled and leak tested during the year (cans/year), and then multiply by 1 ton/2000 pounds.