

Facility ID: 0125040238 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.

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

Facility ID: 0125040238 Emissions Unit ID: J005 Issuance type: Final State Permit To Operate

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**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>
2-arm formaldehyde load rack with vapor balance to distillate storage tank	OAC rule 3745-35-07(B)(2)	Formaldehyde emissions shall not exceed 0.1 ton/yr.
	OAC rule 3745-21-07(E)(2)	See sections A.2.a and A.2.b below. The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-35-07 (B)(2).

**2. Additional Terms and Conditions**

- (a) The loading rack shall be equipped with a vapor collection system whereby during the transfer of product to any delivery vessel, all vapors displaced from the delivery vessel during loading are vented only to the vapor collection system.
 

The vapor collection system shall vent to the vapor balance to the inlet of the formaldehyde plant to achieve a minimum 98% destruction efficiency, by weight.  
The restrictions on the potential to emit for facility-wide individual hazardous air pollutants (HAP), total combined HAP and organic compounds (OC) established under OAC rule 3745-35-07(C) are as follows for P004, P005, P006, P008, P010, P012, P013, P014, P016, P018, P020, P021, P024, P025, P026, J005, T054, T055, T069, T070, T100, T101:

  - i. the facility-wide individual HAP and total HAP emissions shall not exceed 9.9 tons and 24.9 tons as a rolling, 12-month summation, respectively, and
  - ii. the facility-wide total VOC emissions shall not exceed 99.9 tons as a rolling, 12-month summation

Therefore, the permittee, by complying with the federally enforceable terms and conditions, will not be subject to Title V permitting and provisions in the the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Organic Chemical Manufacturing 40 CFR Part 63 Subpart FFFF and Polymer & Resins III MACT under 40 CFR Part 63 Subpart OOO. The restrictions to potential to emit (PTE) for this emissions unit, as documented with on-site record keeping at this facility, will ensure that the individual HAP, and total combined HAP and OC, emissions will not exceed the Title V and MACT applicability thresholds.

**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. The permittee shall not permit formaldehyde product to be spilled or handled in any other manner that would result in evaporation.
3. All formaldehyde product loading lines and vapor lines shall be equipped with fittings that are vapor tight.
4. The maximum annual throughput for this loading station shall not exceed 8,665,000 gallons per year.

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

1. The permittee shall maintain a record of the company identification and the gallons (or weight in pounds) of formaldehyde product loaded through this emissions unit during each month.

2. The permittee shall collect and record a log of the downtime for the educer pump on the distillate storage tank, the vapor balance to the fresh air intake of the formaldehyde plant and the formaldehyde plant during each day of load rack operation.
3. The permittee shall maintain the following monthly records on-site to document compliance with the facility-wide restriction on the potential to emit for OC, individual HAP, and total HAP. The records shall include a minimum of the following information for emissions units P004, P005, P006, P008, P010, P012, P013, P014, P016, P018, P020, P021, P024, P025, P026, J005, T054, T055, T069, T070, T100, T101 along with any permanent exempt and de minimis emissions units:
  - a. the individual HAP1 emissions for each emissions unit at this facility, in pounds or tons;
  - b. the total combined HAP emissions for each emissions unit at this facility, in pounds or tons;
  - c. the individual HAP emissions for all emissions units at this facility, in pounds or tons;
  - d. the total combined HAP emissions for all emissions units at this facility, in pounds or tons;
  - e. the rolling 12-month summation of individual HAP emissions for all emissions units at the facility, in tons(i.e., the value from the current month added to the summation of the individual HAP emissions from the previous 11 months);
  - f. the rolling, 12-month summation of the total combined HAP emissions for all emissions units at the facility, in tons (i.e., the value from the current month added to the summation of the total combined HAP emissions from the previous 11 months);
  - g. the VOC emission for each emissions unit at the facility, in pounds or tons; and
  - h. the rolling 12-month summation of the VOC emissions for all emissions units at the facility, in tons (i.e., the value from the current month added t the summation of the VOC emissions from the previous 11 months).

1A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials.

**D. Reporting Requirements**

1. In accordance with paragraph A.1 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which identify the number of hours of downtime for the capture (collection) system and the formaldehyde plant, when the associated emissions unit was in operation.
2. The facility shall submit annual reports to the Ohio EPA, which at a minimum specify the total formaldehyde emissions from loading station 5 (J005), for the previous calendar year (January 1 through December 31). The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
3. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedences of the following facility-wide emission limitations and operational restrictions:
  - a. the rolling 12-month individual HAP and total HAP emission limitations listed in term A.2.b; and
  - b. the rolling, 12-month VOC emission limitation listed in term A.2.b.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
Formaldehyde emissions from the formaldehyde loading station shall not exceed 0.1 ton/yr.

**Applicable Compliance Method:**

The annual emission limitation is based on a controlled annual PTE of loading station 5 and an emission factor of 0.03 lb formaldehyde/1000 gallon loaded as derived using equations in AP-42 section 4.4 at the partial vapor pressure of 0.752 psi at 95 degrees Fahrenheit (average storage temperature). The emission factor is multiplied by the annual throughput of 8,665,000 gallons multiplied by 0.5 (50% of the constituent concentration of formaldehyde) and divided by 2,000 lbs/ton to yield 0.1 ton OC/yr.

**Emission Limitation:**

The facility-wide emissions of individual HAP and total HAP shall not exceed 9.9 tons and 24.9 tons as a rolling, 12-month summation, respectively.

**Applicable Compliance Method:**

Compliance shall be demonstrated by the record keeping requirements specified in section C.3 of this permit.

**Emission Limitation:**

The total facility-wide VOC emissions shall not exceed 99.9 tons as a rolling, 12-month summation.

**Applicable Compliance Method:**

Compliance shall be demonstrated by the record keeping requirements specified in section C.3 of this permit.

**F. Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-35-07, the following special terms and conditions of this permit to operate are federally enforceable: A-F.