

Facility ID: 1677010322 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.

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Facility ID: 1677010322 Emissions Unit ID: J001 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>
Non-gasoline loading rack	PTI#16-1440	3.3 tons of organic materials per month
		13.5 tons of organic materials per year
		2.0 tons of hazardous air pollutants (HAPs) per month
		5.0 tons of HAPs per year
		See A.2.a below.
	OAC 3745-21-07(E)	See A.2.b below.
	OAC 3745-35-07	

2. Additional Terms and Conditions

- (a) The permittee shall not load in any one day more than forty thousand gallons of any volatile photochemically reactive material.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. Submerged filling shall be employed when loading products into the tanker trucks.

C. Monitoring and/or Record Keeping Requirements

- 1. If a volatile photochemically reactive material is loaded, then the permittee shall maintain daily records of the following information:
 - a. The identification of each volatile photochemically reactive material loaded.
 - b. The total throughput, in gallons, of all volatile photochemically reactive materials.
- 2. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative

emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.

d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all days during which more than 40,000 gallons of volatile photochemically reactive materials were loaded, and the actual volume of the volatile photochemically reactive materials loaded during each such day.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the monthly and annual emission limitations for organic materials and total combined HAPs for J001.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
4. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. The annual emissions of organic materials and total combined HAPs for J001.
 - b. For all emissions units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A, B, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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Facility ID: 1677010322 Emissions Unit ID: P003 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</u>
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<p>Splash fill container filling line</p>	<p>PTI#16-1440</p>	<p>Measures 3.0 tons of organic materials per month 5.3 tons of organic materials per year 1.0 ton of hazardous air pollutants (HAPs) per month 1.8 tons of HAPs per year See A.2.a below. See A.2.b below.</p>
	<p>OAC 3745-21-07(G)(2)</p>	<p>See A.2.b below.</p>
	<p>OAC 3745-35-07</p>	

2. Additional Terms and Conditions

- (a) If a photochemically reactive material is transferred, the emissions unit shall not discharge more than 8.0 pounds of organic materials per hour and 40 pounds of organic materials per day.
 Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.
- 2. For each day that a photochemically reactive material is transferred, the permittee shall collect and record the following information:
 - a. Identification for each product transferred and its daily throughput.
 - b. Total daily throughput of all products in 55-gallon drum equivalents or gallons.
 - c. The total organic compound emission rate for all products transferred, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly organic compound emission rate for all products transferred, i.e. (c)/(d), in pounds per hour (average).

The permittee shall continue to record the above information for the first six months of operation after the issuance of this permit. If the permittee can demonstrate that the emissions from P003 are consistently below 80% of the allowable hourly and daily rates, then the permittee shall record the following information in lieu of

the above if the daily throughput of P003 does not exceed the maximum daily throughput of P003 during the months in which the above detailed records were kept:

- a. Identification of each product transferred and its daily throughput.
- b. Total daily throughput of all products in 55-gallon drum equivalents or gallons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the monthly and annual emission limitations for organic materials and total combined HAPs for P003.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
3. For the days during which a photochemically reactive material was employed, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate (from the transferring of product) exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such hour; and
 - b. an identification of each day during which the organic compound emission rate (from the transferring of product) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.
4. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. The annual emissions of organic materials and total combined HAPs for P003.
 - b. For all emissions units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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Facility ID: 1677010322 Emissions Unit ID: P004 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>
Submerged fill container filling line	PTI#16-1440	1.6 tons of organic materials per month
		2.5 tons of organic materials per year
		0.4 ton of hazardous air pollutants (HAPs) per month
		0.8 tons of HAPs per year
		See A.2.a below.
	OAC 3745-21-07(G)(2)	See A.2.b below.
	OAC 3745-35-07	

2. **Additional Terms and Conditions**

- (a) If a photochemically reactive material is transferred, the emissions unit shall not discharge more than 8.0 pounds of organic materials per hour and 40 pounds of organic materials per day.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. **Operational Restrictions**

1. None

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

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.
2. For each day that a photochemically reactive material is transferred, the permittee shall collect and record the following information:
 - a. Identification for each product transferred and its daily throughput.
 - b. Total daily throughput of all products in 55-gallon drum equivalents or gallons.
 - c. The total organic compound emission rate for all products transferred, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.

- e. The average hourly organic compound emission rate for all products transferred, i.e. (c)/(d), in pounds per hour (average).

The permittee shall continue to record the above information for the first six months of operation after the issuance of this permit. If the permittee can demonstrate that the emissions from P004 are consistently below 80% of the allowable hourly and daily rates, then the permittee shall record the following information in lieu of the above if the daily throughput of P004 does not exceed the maximum daily throughput of P004 during the months in which the above detailed records were kept:

- a. Identification of each product transferred and its daily throughput.
- b. Total daily throughput of all products in 55-gallon drum equivalents or gallons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the monthly and annual emission limitations for organic materials and total combined HAPs for P004.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
3. For the days during which a photochemically reactive material was employed, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate (from the transferring of product) exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such hour; and
 - b. an identification of each day during which the organic compound emission rate (from the transferring of product) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.
4. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. The annual emissions of organic materials and total combined HAPs for P004.
 - b. For all emissions units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: P005 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>
Submerged fill tote filling line	PTI#16-1440	0.3 ton of organic materials per month
		0.7 ton of organic materials per year
		0.2 ton of hazardous air pollutants (HAPs) per month
		0.5 tons of HAPs per year
		See A.2.a below.
	OAC 3745-21-07(G)(2)	See A.2.b below.
	OAC 3745-35-07	

2. Additional Terms and Conditions

- (a) If a photochemically reactive material is transferred, the emissions unit shall not discharge more than 8.0 pounds of organic materials per hour and 40 pounds of organic materials per day.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.
- 2. For each day that a photochemically reactive material is transferred, the permittee shall collect and record the following information:
 - a. Identification for each product transferred and its daily throughput.

- b. Total daily throughput of all products in 55-gallon drum equivalents or gallons.
 - c. The total organic compound emission rate for all products transferred, in pounds per day.
 - d. The total number of hours the emissions unit was in operation.
 - e. The average hourly organic compound emission rate for all products transferred, i.e. (c)/(d), in pounds per hour (average).

The permittee shall continue to record the above information for the first six months of operation after the issuance of this permit. If the permittee can demonstrate that the emissions from P005 are consistently below 80% of the allowable hourly and daily rates, then the permittee shall record the following information in lieu of the above if the daily throughput of P005 does not exceed the maximum daily throughput of P005 during the months in which the above detailed records were kept:

- a. Identification of each product transferred and its daily throughput.
- b. Total daily throughput of all products in 55-gallon drum equivalents or gallons.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the monthly and annual emission limitations for organic materials and total combined HAPs for P005.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
3. For the days during which a photochemically reactive material was employed, the permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average hourly organic compound emission rate (from the transferring of product) exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such hour; and
 - b. an identification of each day during which the organic compound emission rate (from the transferring of product) exceeded 40 pounds per day, and the actual organic compound emission rate for each such day.
4. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. The annual emissions of organic materials and total combined HAPs for P005.
 - b. For all emissions units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T001 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09 (L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T002 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
		c. Applies when storing petroleum liquids.
	c. OAC 3745-21-09(L)(2)	d. See A.2.b below.

d. OAC 3745-35-07

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
- The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
- For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
- For each of the storage tanks, Tanks 3.0 shall be employed.
 - For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T003 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T004 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive material. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T005 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T006 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative

emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.

d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T007 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.

c. Applies when storing petroleum liquids.

c. OAC 3745-21-09(L)(2)

d. See A.2.b below.

d. OAC 3745-35-07

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

- 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.

- d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

- 1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T008 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7

1-11 55.0 9.1 22.1
1-12 58.7 9.9 23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
- The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
- For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
- For each of the storage tanks, Tanks 3.0 shall be employed.
 - For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T009 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.
- 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

(a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:

a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:

- a. For each of the storage tanks, Tanks 3.0 shall be employed.
- b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
- c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
- d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T010 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T011 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:

- a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

- 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

- 1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T012 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no

emission limitations or control measures were specified.

- b. OAC 3745-21-07(D)(2) b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
- c. OAC 3745-21-09(L)(2) c. Applies when storing petroleum liquids.
- d. OAC 3745-35-07 d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

- 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.

b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.

c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.

d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T013 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

(a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8

1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T014 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>
30,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month

facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.

2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T015 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>
9,700 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. **Additional Terms and Conditions**

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
- The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
- For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
- For each of the storage tanks, Tanks 3.0 shall be employed.
 - For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally

enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T016 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>
5,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T017 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>
5,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

- 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total

combined HAP emission limitations of this permit, the permittee shall employ the following:

- a. For each of the storage tanks, Tanks 3.0 shall be employed.
- b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
- c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
- d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

- 1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T018 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>
5,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
- The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
- For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
- For each of the storage tanks, Tanks 3.0 shall be employed.
 - For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T019 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>
12,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total

combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T021 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>
12,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
		c. Applies when storing petroleum liquids.
	c. OAC 3745-21-09(L)(2)	d. See A.2.b below.

d. OAC 3745-35-07

2. **Additional Terms and Conditions**

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. **Operational Restrictions**

- 1. None

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

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. **Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. **Testing Requirements**

- 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T022 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>
12,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
- The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
- For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
- For each of the storage tanks, Tanks 3.0 shall be employed.
 - For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.
- Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T024 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.
- 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.
- 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>
8,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January

through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T026 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>
5,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T027 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>
5,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.

- b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

- 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

- 1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T028 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>
12,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.

- b. OAC 3745-21-07(D)(2)
 - b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
 - c. Applies when storing petroleum liquids.
- c. OAC 3745-21-09(L)(2)
 - d. See A.2.b below.
- d. OAC 3745-35-07

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

- 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.

c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.

d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T029 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>
12,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8

1-7 42.0 6.5 16.3
 1-8 44.0 7.2 17.6
 1-9 49.0 8.0 19.0
 1-10 53.0 8.7 20.7
 1-11 55.0 9.1 22.1
 1-12 58.7 9.9 23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
- The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

- To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - For each of the storage tanks, Tanks 3.0 shall be employed.
 - For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

- Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T030 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).

- 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.
 - 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>
12,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum

allowable cumulative facility-wide emission levels.

2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T032 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>
16,900 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.

Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T035 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>
20,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.
- D. **Reporting Requirements**
 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.
- E. **Testing Requirements**
 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.
- F. **Miscellaneous Requirements**
 1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T036 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</u>
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20,000 gal. fixed roof tank

a. PTI #16-070

Measures

a. No applicable rules were established and no emission limitations or control measures were specified.

b. OAC 3745-21-07(D)(2)

b. Applies when storing volatile photochemically reactive materials. See A.2.a below.

c. OAC 3745-21-09(L)(2)

c. Applies when storing petroleum liquids.

d. See A.2.b below.

d. OAC 3745-35-07

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

- 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:

- a. For each of the storage tanks, Tanks 3.0 shall be employed.
- b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
- c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
- d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

- 1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T037 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>
20,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2

1-2 19.5 3.0 9.1
 1-3 25.0 4.0 10.4
 1-4 29.4 5.0 11.8
 1-5 33.0 5.5 13.0
 1-6 38.0 6.0 14.8
 1-7 42.0 6.5 16.3
 1-8 44.0 7.2 17.6
 1-9 49.0 8.0 19.0
 1-10 53.0 8.7 20.7
 1-11 55.0 9.1 22.1
 1-12 58.7 9.9 23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
- The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
- For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
- For each of the storage tanks, Tanks 3.0 shall be employed.
 - For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.
- Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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Facility ID: 1677010322 Emissions Unit ID: T038 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>
20,000 gal. fixed roof tank	a. PTI #16-095	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T040 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>
10,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
		c. Applies when storing petroleum liquids.
	c. OAC 3745-21-09(L)(2)	d. See A.2.b below.

d. OAC 3745-35-07

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
- The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
- For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
- For each of the storage tanks, Tanks 3.0 shall be employed.
 - For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T041 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>
21,600 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T042 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>
21,600 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T043 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>
20,000 gal. fixed roof tank	a. PTI #16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T044 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>
3,200 gal. fixed roof tank	a. PTI#16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative

emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.

d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T045 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>
4,200 gal. fixed roof tank	a. PTI#16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.

c. Applies when storing petroleum liquids.

c. OAC 3745-21-09(L)(2)

d. See A.2.b below.

d. OAC 3745-35-07

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

- 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.

- d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

- 1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T046 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>
5,600 gal. fixed roof tank	a. PTI#16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7

1-11 55.0 9.1 22.1
1-12 58.7 9.9 23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
- The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
- For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
- For each of the storage tanks, Tanks 3.0 shall be employed.
 - For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T047 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.
- 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>
5,600 gal. fixed roof tank	a. PTI#16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

(a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:

a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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Facility ID: 1677010322 Emissions Unit ID: T048 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>
30,000 gal. fixed roof tank	a. PTI#16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T049 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>
8,500 gal. fixed roof tank	a. PTI#16-070	a. No applicable rules were established and no emission limitations or control measures were specified.
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:

- a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.
- D. **Reporting Requirements**
 - 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
 - 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.
- E. **Testing Requirements**
 - 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.
- F. **Miscellaneous Requirements**
 - 1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T050 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>
8,000 gal. fixed roof tank	a. PTI#16-070	a. No applicable rules were established and no

emission limitations or control measures were specified.

- b. OAC 3745-21-07(D)(2) b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
- c. OAC 3745-21-09(L)(2) c. Applies when storing petroleum liquids.
- d. OAC 3745-35-07 d. See A.2.a below.

2. Additional Terms and Conditions

(a) Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

- 1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.

c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.

d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T052 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>
8,300 gal. fixed roof tank	a. PTI #16-432	a. 0.075 tons of volatile organic compounds per year
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6

1-9 49.0 8.0 19.0
 1-10 53.0 8.7 20.7
 1-11 55.0 9.1 22.1
 1-12 58.7 9.9 23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
- The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
- For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
- For each of the storage tanks, Tanks 3.0 shall be employed.
 - For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T056 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.
- 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>
10,000 gal. fixed roof tank	a. PTI #16-883	a. 7.14 pounds of volatile organic compounds per day maximum
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months	Organic Material	Individual HAP	Combined HAPs
1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

- 1. None

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
- 2. The permittee shall submit annual reports on February 15 of each year that specify the following information:

a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T057 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>
10,000 gal. fixed roof tank	a. PTI #16-883	a. 7.14 pounds of volatile organic compounds per day maximum
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.
 - c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.
 - d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.

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

Facility ID: 1677010322 Emissions Unit ID: T058 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>
10,000 gal. fixed roof tank	a. PTI #16-883	a. 7.14 pounds of volatile organic compounds per day maximum
	b. OAC 3745-21-07(D)(2)	b. Applies when storing volatile photochemically reactive materials. See A.2.a below.
	c. OAC 3745-21-09(L)(2)	c. Applies when storing petroleum liquids.
	d. OAC 3745-35-07	d. See A.2.b below.

2. Additional Terms and Conditions

- (a) The permittee shall equip this storage tank with a permanent submerged fill pipe to be used whenever volatile photochemically reactive material is stored in or removed from the tank.
Facility Wide

The emissions of organic materials, any individual HAP, and the total combined HAPs from the facility shall not exceed 58.7, 9.9, and 23.5 tons per year, respectively, based upon rolling, 12-month summations of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative emission levels, in tons, as specified in the following table:

Months Organic Material Individual HAP Combined HAPs

1	14.7	2.5	8.2
1-2	19.5	3.0	9.1
1-3	25.0	4.0	10.4
1-4	29.4	5.0	11.8
1-5	33.0	5.5	13.0
1-6	38.0	6.0	14.8
1-7	42.0	6.5	16.3
1-8	44.0	7.2	17.6
1-9	49.0	8.0	19.0
1-10	53.0	8.7	20.7
1-11	55.0	9.1	22.1
1-12	58.7	9.9	23.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for organic materials, any individual HAP, and the total combined HAPs shall be based upon rolling, 12-month summations of the monthly emissions.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for all emissions units at the facility:
 - a. The emissions of organic materials, each individual HAP, and the total combined HAPs for each month, and the calculations for each category.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summations of the emissions of organic materials, each individual HAP, and the total combined HAPs.

c. During the first 12 calendar months of operation following the issuance of this permit, the cumulative emissions of organic materials, each individual HAP, and the total combined HAPs for each calendar month.

d. If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, the emissions for each individual HAP do not need to be calculated unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month facility-wide emission limitations for organic materials, any individual HAP, and the total combined HAPs and, for the first 12 calendar months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative facility-wide emission levels.
2. The permittee shall submit annual reports on February 15 of each year that specify the following information:
 - a. For all emission units at the facility, the rolling, 12-month summations of the monthly emissions of organic materials, each individual HAP, and total combined HAPs for each month during the calendar year (January through December). If for the first 12-month period, the rolling, 12-month summation of the monthly emissions of the total combined HAPs does not exceed 9.9 tons per year, then the emissions for each individual HAP do not have to be reported unless any subsequent rolling, 12-month summation exceeds 9.9 tons per year.

E. Testing Requirements

1. To calculate emissions for purposes of determining compliance with the applicable VOC, individual HAP, and total combined HAP emission limitations of this permit, the permittee shall employ the following:
 - a. For each of the storage tanks, Tanks 3.0 shall be employed.
 - b. For J001, P003, P004, and P005, the equation for loading losses in Section 5.2.2.1.1 of AP-42 (5th Edition) shall be employed.
 - c. For fugitive emissions from pumps, flanges, and valves, Marketing Terminal average emission factors (EPA 453/R-95-017, November 1995) shall be employed.
 - d. For the groundwater air stripper, the most recent U.S. EPA Method 8240 or U.S. EPA Method 8260 Volatile Organics Analysis data shall be employed.

Should more accurate emission factors be developed during the current permit cycle, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, the Akron Regional Air Quality Management District, and the Ashland Chemical Company.

F. Miscellaneous Requirements

1. Sections A.1.b, A.1.c, A.1.d, A.2.a, A.2.b, C, D, E, and F of these terms and conditions constitute the federally enforceable portions of this permit.