

Facility ID: 1677130036 Issuance type: Final State Permit To Operate

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

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

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

- [Go to Part II for Emissions Unit J001](#)
- [Go to Part II for Emissions Unit J002](#)
- [Go to Part II for Emissions Unit P001](#)
- [Go to Part II for Emissions Unit P004](#)
- [Go to Part II for Emissions Unit P005](#)
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Facility ID: 1677130036 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>
West loading and unloading rack for bulk liquid chemicals.	OAC Rule 3745-31-05 PTI 16-1840	Compliance with the special terms and conditions of this permit.
	OAC Rule 3745-35-07(B)(1)	Facility-wide emissions shall be limited to: 69.9 TPY organic materials, 24.9 TPY hazardous air pollutants, 9.9 TPY any single HAP, (On a rolling 12-month basis.)
	OAC Rule 3745-21-07(E)(1)	Daily throughput shall not exceed 40,000 gallons per day of volatile photochemically reactive material.

2. **Additional Terms and Conditions**
 - (a) The Permittee shall not emit or allow the escape into the open air any smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combination of substances in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property.
The Facility-wide emissions stated above shall include all the emissions from the Bulk facility and the warehouse facility combined.

B. Operational Restrictions

1. The emissions of organic compounds (VOC s) shall not exceed 49.9 tons per year for the entire facility as a rolling 12-month summation.
2. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.
3. The emissions of any one HAP shall not exceed 9.9 tons for the entire facility as a rolling 12-month summation.
4. The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.
5. The following operation and physical restrictions at the facility where used in establishing the Realistic Worst Case Scenario for modeling and demonstrating compliance with the Ohio Air Toxics Policy.

- a. The maximum pump rate permitted is 220 gallons per minute due to the size of the piping (3 inches.)
 - b. Even if multiple pumps are pumping material from different places into branches of the same line, the maximum rated throughput for that line shall be limited to 220 gallons per minute. And, conversely if two pumps are pumping material from two branches of the same line the total flow shall not exceed 220 gallons per minute.
6. The total usage in the mixing tanks (P004, P005 and P006), combined of the below listed eight (8) chemicals, shall not exceed 1,788,750 gallons per calendar month for each of the chemicals listed below.
- a. hydrogen peroxide
 - b. 2-methoxyethanol
 - c. acetic acid
 - d. n, n-dimethylformamide
 - e. furfural
 - f. 2-ethoxyethanol
 - g. n-pentane
 - h. n-hexane
7. Operations involving the use of methylene chloride shall be restricted as follows:
- a. No more than 573,750 gallons of methylene chloride shall be mixed in emissions unit P004 (inside mixing tank) to form blends.
 - b. There shall be no blends containing methylene chloride made in either of the outside blend tanks (P005 & P006).
 - c. The permittee shall include these restrictions in the Standard Operating Procedures(SOP) for the facility. A copy of the SOP shall be submitted to The Akron Regional Air Quality Management District within 90 days of the issuance of this permit.
8. All loading operations done at emissions unit J001 & J002 shall be performed using submerged or bottom fill.
- C. Monitoring and/or Record Keeping Requirements**
- 1. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).
 - 2. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 - 3. The permittee shall collect and record the following information for each change where fair toxic modeling was required pursuant to the Ohio Air Toxic Policy:
 - a. background data that describes the parameters changed (compositionn of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still stifies the Ohio Air Toxic Policy; and
 - c. where computer modeling is performed , a copy of the resultiing computer model runs that show the results of the application of the Ait Toxics Policy for the change.
 - 4. The permittee shall collect and maintain records to demonstrate that the facility-wide mixing tank throughput of the inside and outside mixing tanks (P004, P005, and P006) does not exceed 1,788,750 gallons per month of the chemicals listed in B.6.
 - 5. The permittee shall collect and maintain records to demonstrate the compliance with the throughput of methylene chloride through the inside mixing tank (P004) does not exceed 573,750 gallons per month.
 - 6. The permittee shall collect and maintain records to demonstrate compliance with the throughput restriction of 40,000 gallons per day of volatile photochemically reactive material. These records shall be clearly discernible on the monthly recordkeeping data report.
- D. Reporting Requirements**
- 1. The permittee shall notify the Director in writing of any daily record showing an exceedance of any emission limitation or operating restriction. A copy of such record shall be sent to the Director within 60 days following the end of the calendar month.
 - 2. The permittee shall notify the Director in writing of any monthly record showing an exceedance of the facility-wide emission limitation for organic compounds, combined HAPs or any individual HAP, as set forth in B.1-3. A copy of such record shall be sent to the Director within 60 days following the occurrence.
 - 3. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAP's, and singal HAP's. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by June 15 of each year and shall cover the previous calendar year's activities.

4. The deviation reports shall be submitted in accordance with, and as required by the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in PTI #16-1986 shall be determined in accordance with the following methods:

Emission Limitation:

The total facility-wide emissions of organic materials, and Hazardous Air Pollutants.

Applicable Compliance Method:

Monthly and rolling 12-month records demonstrating compliance with the facility wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).

Operational Restrictions

Throughput, and usage restrictions for toxic Air Pollutants as a result of the Ohio Air Toxics Policy.

Applicable Compliance Method:

Records shall be maintained demonstrating compliance with the throughput and usage limitations, along with ISCST3 Modeling results that indicate the operational restrictions are sufficient to meet the requirements of the Ohio Air Toxics Policy.

F. Miscellaneous Requirements

1. The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.
2. This permit allows the use of the materials specified by the permittee in the application for PTI number 16-1840. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation (s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the USEPA ISCST3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC TLV/42 and/or TLV/10 for pollutants that are restricted to a throughput of 2,000,000 gallons per month and a flow rate of 220 gallons per minute. The following summarizes the results of the modeling for each pollutant:

SEE Computer Modeling Results Submitted by the Permittee.

Physical changes or changes in method of operation of the emissions unit that results in changes to the factors affecting the air toxic analysis could result in the noncompliance with the permit to install (PTI 16-1840).

In order to avoid this noncompliance situation prior to initiating any changes the permittee is required to conduct an evaluation to determine that the "Ohio Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. any changes in the composition of materials, or the use of materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled;
 - c. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- The Ohio EPA will not consider any of the above mentioned as a modification requiring a PTI, if the following conditions are met:
- a. the change is not otherwise considered a modification under OAC rule 3745-31;
 - b. the permittee can continue to comply with the allowable emissions limitations in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changes emissions unit still satisfies the Air Toxic Policy, and the Permittee maintains documentation that identifies the change and the results of the change of the Air Toxics Policy for the change.

3. For any change to the emissions unit or its method of operation that would require an increase in the emissions limitation established, or or would otherwise be considered a modification under OAC rule 3745-31-01, the permittee shall obtain a final PTI prior to the change.
4. If the Environmental Review Appeals Commission (ERAC) decision that this emissions unit is not subject to OAC rule 3745-21-07(G)(2) is overturned, emissions units P001, P004, P005, P006, P008, P009, and P010 shall comply with OAC rule 3745-21-07(G)(2). Appropriate record keeping and reporting requirements to demonstrate compliance with OAC rule 3745-21-07(G)(2) shall be developed for these emissions units at that time.

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Facility ID: 1677130036 Emissions Unit ID: J002 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>
East loading and unloading rack for bulk liquid chemicals.	OAC Rule 3745-31-05 PTI 16-1840	Compliance with the special terms and conditions of this permit.
	OAC Rule 3745-35-07(B)(1)	Facility-wide emissions shall be limited to: 69.9 TPY organic materials, 24.9 TPY hazardous air pollutants, 9.9 TPY any single HAP, (On a rolling 12-month basis.)
	OAC Rule 3745-21-07(E)(1)	Daily throughput shall not exceed 40,000 gallons per day of volatile photochemically reactive material.

2. Additional Terms and Conditions

- (a) The Permittee shall not emit or allow the escape into the open air any smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combination of substances in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property.
The Facility-wide emissions stated above shall include all the emissions from the Bulk facility and the warehouse facility combined.

B. Operational Restrictions

1. The emissions of organic compounds (VOC s) shall not exceed 69.9 tons per year for the entire facility as a rolling 12-month summation.
2. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.
3. The emissions of any one HAP shall not exceed 9.9 tons for the entire facility as a rolling 12-month summation.
4. The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.
5. The following operation and physical restrictions at the facility where used in establishing the Realistic Worst Case Scenario for modeling and demonstrating compliance with the Ohio Air Toxics Policy.
 - a. The maximum pump rate permitted is 220 gallons per minute due to the size of the piping (3 inches.)
 - b. Even if multiple pumps are pumping material from different places into branches of the same line, the maximum rated throughput for that line shall be limited to 220 gallons per minute. And, conversely if two pumps are pumping material from two branches of the same line the total flow shall not exceed 220 gallons per minute.
6. The total usage in the mixing tanks (P004, P005 and P006), combined of the below listed eight (8) chemicals, shall not exceed 1,788,750 gallons per calendar month for each of the chemicals listed below.
 - a. hydrogen peroxide
 - b. 2-methoxyethanol
 - c. acetic acid
 - d. n, n-dimethylformamide
 - e. furfural

- f. 2-ethoxethanol
 - g. n-pentane
 - h. n-hexane
7. Operations involving the use of methylene chloride shall be restricted as follows:
- a. No more than 573,750 gallons of methylene chloride shall be mixed in emissions unit P004 (inside mixing tank) to form blends.
 - b. There shall be no blends containing methylene chloride made in either of the outside blend tanks (P005 & P006).
 - c. The permittee shall include these restrictions in the Standard Operating Procedures(SOP) for the facility. A copy of the SOP shall be submitted to The Akron Regional Air Quality Management District within 90 days of the issuance of this permit.
8. All loading operations done at emissions unit J001 & J002 shall be performed using submerged or bottom fill.
- C. Monitoring and/or Record Keeping Requirements**
- 1. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).
 - 2. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 - 3. The permittee shall collect and record the following information for each change where fair toxic modeling was required pursuant to the Ohio Air Toxic Policy:
 - a. background data that describes the parameters changed (compositionn of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still stifies the Ohio Air Toxic Policy; and
 - c. where computer modeling is performed , a copy of the resulting computer model runs that show the results of the application of the Ait Toxics Policy for the change.
 - 4. The permittee shall collect and maintain records to demonstrate that the facility-wide mixing tank throughput of the inside and outside mixing tanks (P004, P005, and P006) does not exceed 1,788,750 gallons per month of the chemicals listed in B.6.
 - 5. The permittee shall collect and maintain records to demonstrate the compliance with the throughput of methylene chloride through the inside mixing tank (P004) does not exceed 573,750 gallons per month.
 - 6. The permittee shall collect and maintain records to demonstrate compliance with the throughput restriction of 40,000 gallons per day of volatile photochemically reactive material. These records shall be clearly discernble on the monthly recordkeeping data report.
- D. Reporting Requirements**
- 1. The permittee shall notify the Director in writing of any daily record showing an exceedance of any emission limitation or operating restriction. A copy of such record shall be sent to the Director within 60 days following the end of the calendar month.
 - 2. The permittee shall notify the Director in writing of any monthly record showing an exceedance of the facility-wide emission limitation for organic compounds, combined HAPs or any individual HAP, as set forth in B.1-3. A copy of such record shall be sent to the Director within 60 days following the occurrence.
 - 3. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAP's, and singal HAP's. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by June 15 of each year and shall cover the previous calendar year's activities.
 - 4. The deviation reports shall be submitted in accordance with, and as required by the reporting requirements of the General Terms and Conditions of this permit.
- E. Testing Requirements**
- 1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods:
Emission Limitation:

The total facility-wide emissions of organic materials, and Hazardous Air Pollutants.

Applicable Compliance Method:

Monthly and rolling 12-month records demonstrating compliance with the facility wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).
Operational Restrictions

Throughput, and usage restrictions for toxic air pollutants as a result of the Ohio Air Toxics Policy.

Applicable Compliance Method:

Records shall be maintained demonstrating compliance with the throughput and usage limitations, along with ISCST3 Modeling results that indicate the operational restrictions are sufficient to meet the requirements of the Ohio Air Toxics Policy.

F. **Miscellaneous Requirements**

1. The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.
2. This permit allows the use of the materials specified by the permittee in the application for PTI number 16-1840. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation (s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the USEPA ISCST3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC TLV/42 and/or TLV/10 for pollutants that are restricted to a throughput of 2,000,000 gallons per month and a flow rate of 220 gallons per minute. The following summarizes the results of the modeling for each pollutant:

SEE Computer Modeling Results Submitted by the Permittee.

Physical changes or changes in method of operation of the emissions unit that results in changes to the factors affecting the air toxic analysis could result in the noncompliance with the permit to install (PTI 16-1840). In order to avoid this noncompliance situation prior to initiating any changes the permittee is required to conduct an evaluation to determine that the "Ohio Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. any changes in the composition of materials, or the use of materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled;
- c. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

The Ohio EPA will not consider any of the above mentioned as a modification requiring a PTI, if the following conditions are met:

- a. the change is not otherwise considered a modification under OAC rule 3745-31;
 - b. the permittee can continue to comply with the allowable emissions limitations in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the change emissions unit still satisfies the Air Toxic Policy, and the Permittee maintains documentation that identifies the change and the results of the change of the Air Toxics Policy for the change.
3. For any change to the emissions unit or its method of operation that would require an increase in the emissions limitation established, or would otherwise be considered a modification under OAC rule 3745-31-01, the permittee shall obtain a final PTI prior to the change.
 4. If the Environmental Review Appeals Commission (ERAC) decision that this emissions unit is not subject to OAC rule 3745-21-07(G)(2) is overturned, emissions units P001, P004, P005, P006, P008, P009, and P010 shall comply with OAC rule 3745-21-07(G)(2). Appropriate record keeping and reporting requirements to demonstrate compliance with OAC rule 3745-21-07(G)(2) shall be developed for these emissions units at that time.

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Facility ID: 1677130036 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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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>
Chemical material filling line for drums, totes, and other small containers	OAC Rule 3745-31-05 PTI 16-1840	Compliance with the special terms and conditions of this permit.
	OAC Rule 3745-35-07(B)(1)	Facility-wide emissions shall be limited to: 69.9 TPY organic materials, 24.9 TPY hazardous air pollutants, 9.9 TPY any single HAP, (On a rolling 12-month basis.) See 2.a below.
	OAC Rule 3745-15-07	

2. Additional Terms and Conditions

- (a) The Permittee shall not emit or allow the escape into the open air any smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combination of substances in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property.
The Facility-wide emissions stated above shall include all the emissions from the Bulk facility and the warehouse facility combined.

B. Operational Restrictions

1. The emissions of organic compounds (VOC s) shall not exceed 69.9 tons per year for the entire facility as a rolling 12-month summation.
2. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.
3. The emissions of any one HAP shall not exceed 9.9 tons for the entire facility as a rolling 12-month summation.
4. The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.
5. The following operation and physical restrictions at the facility where used in establishing the Realistic Worst Case Scenario for modeling and demonstrating compliance with the Ohio Air Toxics Policy.
 - a. The maximum pump rate permitted is 220 gallons per minute due to the size of the piping (3 inches.)
 - b. Even if multiple pumps are pumping material from different places into branches of the same line, the maximum rated throughput for that line shall be limited to 220 gallons per minute. And, conversely if two pumps are pumping material from two branches of the same line the total flow shall not exceed 220 gallons per minute.
6. The total usage in the mixing tanks (P004, P005 and P006), combined of the below listed eight (8) chemicals, shall not exceed 1,788,750 gallons per calendar month for each of the chemicals listed below.
 - a. hydrogen peroxide
 - b. 2-methoxyethanol
 - c. acetic acid
 - d. n, n-dimethylformamide
 - e. furfural
 - f. 2-ethoxyethanol
 - g. n-pentane
 - h. n-hexane
7. Operations involving the use of methylene chloride shall be restricted as follows:
 - a. No more than 573,750 gallons of methylene chloride shall be mixed in emissions unit P004 (inside mixing tank) to form blends.
 - b. There shall be no blends containing methylene chloride made in either of the outside blend tanks (P005 & P006).
 - c. The permittee shall include these restrictions in the Standard Operating Procedures(SOP) for the facility. A copy of the SOP shall be submitted to The Akron Regional Air Quality Management District within 90 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).
 2. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 3. The permittee shall collect and record the following information for each change where fair toxic modeling was required pursuant to the Ohio Air Toxic Policy:
 - a. background data that describes the parameters changed (compositionn of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still stifies the Ohio Air Toxic Policy; and
 - c. where computer modeling is performed , a copy of the resultiing computer model runs that show the results of the application of the Ait Toxics Policy for the change.
 4. The permittee shall collect and maintain records to demonstrate that the facility-wide mixing tank throughput of the inside and outside mixing tanks (P004, P005, and P006) does not exceed 1,788,750 gallons per month of the chemicals listed in B.6.
 5. The permittee shall collect and maintain records to demonstrate the compliance with the throughput of methylene chloride through the inside mixing tank (P004) does not exceed 573,750 gallons per month.
 6. The permittee shall collect and maintain records to demonstrate compliance with the throughput restriction of 40,000 gallons per day of volatile photochemically reactive material. These records shall be clearly discernible on the monthly recordkeeping data report.
- D. Reporting Requirements**
1. The permittee shall notify the Director in writing of any daily record showing an exceedance of any emission limitation or operating restriction. A copy of such record shall be sent to the Director within 60 days following the end of the calendar month.
 2. The permittee shall notify the Director in writing of any monthly record showing an exceedance of the facility-wide emission limitation for organic compounds, combined HAPs or any individual HAP, as set forth in B.1-3. A copy of such record shall be sent to the Director within 60 days following the occurrence.
 3. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAP's, and singal HAP's. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by June 15 of each year and shall cover the previous calendar year's activities.
 4. The deviation reports shall be submitted in accordance with, and as required by the reporting requirements of the General Terms and Conditions of this permit.
- E. Testing Requirements**
1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods:
Emission Limitation:
The total facility-wide emissions of organic materials, and Hazardous Air Pollutants.
Applicable Compliance Method:
Monthly and rolling 12-month records demonstrating compliance with the facility wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).
Operational Restrictions
Throughput, and usage restrictions for toxic air pollutants as a result of the Ohio Air Toxics Policy.
Applicable Compliance Method:
Records shall be maintained demonstrating compliance with the throughput and usage limitations, along with ISCST3 Modeling results that indicate the operational restrictions are sufficient to meet the requirements of the Ohio Air Toxics Policy.
- F. Miscellaneous Requirements**
1. The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.
 2. This permit allows the use of the materials specified by the permittee in the application for PTI number 16-1840. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation (s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the USEPA ISCST3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC TLV/42 and/or TLV/10 for pollutants that are restricted to a throughput of 2,000,000 gallons per month and a flow rate of 220 gallons per minute. The following summarizes the results of the modeling for each pollutant:

SEE Computer Modeling Results Submitted by the Permittee.

Physical changes or changes in method of operation of the emissions unit that results in changes to the factors affecting the air toxic analysis could result in the noncompliance with the permit to install (PTI 16-1840). In order to avoid this noncompliance situation prior to initiating any changes the permittee is required to conduct an evaluation to determine that the "Ohio Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. any changes in the composition of materials, or the use of materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled;
- c. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

The Ohio EPA will not consider any of the above mentioned as a modification requiring a PTI, if the following conditions are met:

- a. the change is not otherwise considered a modification under OAC rule 3745-31;
 - b. the permittee can continue to comply with the allowable emissions limitations in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the change emissions unit still satisfies the Air Toxic Policy, and the Permittee maintains documentation that identifies the change and the results of the change of the Air Toxics Policy for the change.
3. For any change to the emissions unit or its method of operation that would require an increase in the emissions limitation established, or or would otherwise be considered a modification under OAC rule 3745-31-01, the permittee shall obtain a final PTI prior to the change.
4. If the Environmental Review Appeals Commission (ERAC) decision that this emissions unit is not subject to OAC rule 3745-21-07(G)(2) is overturned, emissions units P001, P004 P005, P006, P008, P009, and P010 shall comply with OAC rule 3745-21-07(G)(2). Appropriate record keeping and reporting requirements to demonstrate compliance with OAC rule 3745-21-07(G)(2) shall be developed for these emissions units at that time.

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

Facility ID: 1677130036 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>
8,500 gallon vertical, fixed roof, cone bottom blend tank (Inside)	OAC Rule 3745-31-05 PTI 16-1840	Compliance with the special terms and conditions of this permit.
	OAC Rule 3745-35-07(B)(1)	Facility-wide emissions shall be limited to: 69.9 TPY organic materials, 24.9 TPY hazardous air pollutants, 9.9 TPY any single HAP, (On a rolling 12-month basis.)

See 2.a below.

OAC Rule 3745-15-07

2. Additional Terms and Conditions

- (a) The Permittee shall not emit or allow the escape into the open air any smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combination of substances in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property.
The Facility-wide emissions stated above shall include all the emissions from the Bulk facility and the warehouse facility combined.

B. Operational Restrictions

1. The emissions of organic compounds (VOC s) shall not exceed 69.9 tons per year for the entire facility as a rolling 12-month summation.
 2. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.
 3. The emissions of any one HAP shall not exceed 9.9 tons for the entire facility as a rolling 12-month summation.
 4. The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.
 5. The following operation and physical restrictions at the facility where used in establishing the Realistic Worst Case Scenario for modeling and demonstrating compliance with the Ohio Air Toxics Policy.
 - a. The maximum pump rate permitted is 220 gallons per minute due to the size of the piping (3 inches.)
 - b. Even if multiple pumps are pumping material from different places into branches of the same line, the maximum rated throughput for that line shall be limited to 220 gallons per minute. And, conversely if two pumps are pumping material from two branches of the same line the total flow shall not exceed 220 gallons per minute.
 6. The total usage in the mixing tanks (P004, P005 and P006), combined of the below listed eight (8) chemicals, shall not exceed 1,788,750 gallons per calendar month for each of the chemicals listed below.
 - a. hydrogen peroxide
 - b. 2-methoxyethanol
 - c. acetic acid
 - d. n, n-dimethylformamide
 - e. furfural
 - f. 2-ethoxyethanol
 - g. n-pentane
 - h. n-hexane
 7. Operations involving the use of methylene chloride shall be restricted as follows:
 - a. No more than 573,750 gallons of methylene chloride shall be mixed in emissions unit P004 (inside mixing tank) to form blends.
 - b. There shall be no blends containing methylene chloride made in either of the outside blend tanks (P005 & P006).
 - c. The permittee shall include these restrictions in the Standard Operating Procedures(SOP) for the facility. A copy of the SOP shall be submitted to The Akron Regional Air Quality Management District within 90 days of the issuance of this permit.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).
 2. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 3. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Ohio Air Toxic Policy:
 - a. background data that describes the parameters changed (compositionn of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still stisfies the Ohio Air Toxic Policy; and
 - c. where computer modeling is performed , a copy of the resultiing computer model runs that show the results of the application of the Ait Toxics Policy for the change.

4. The permittee shall collect and maintain records to demonstrate that the facility-wide mixing tank throughput of the inside and outside mixing tanks (P004, P005, and P006) does not exceed 1,788,750 gallons per month of the chemicals listed in B.6.
5. The permittee shall collect and maintain records to demonstrate the compliance with the throughput of methylene chloride through the inside mixing tank (P004) does not exceed 573,750 gallons per month.
6. The permittee shall collect and maintain records to demonstrate compliance with the throughput restriction of 40,000 gallons per day of volatile photochemically reactive material. These records shall be clearly discernible on the monthly recordkeeping data report.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing an exceedance of any emission limitation or operating restriction. A copy of such record shall be sent to the Director within 60 days following the end of the calendar month.
2. The permittee shall notify the Director in writing of any monthly record showing an exceedance of the facility-wide emission limitation for organic compounds, combined HAPs or any individual HAP, as set forth in B.1-3. A copy of such record shall be sent to the Director within 60 days following the occurrence.
3. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAP's, and singal HAP's. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by June 15 of each year and shall cover the previous calendar year's activities.
4. The deviation reports shall be submitted in accordance with, and as required by the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods:

Emission Limitation:

The total facility-wide emissions of organic materials, and Hazardous Air Pollutants.

Applicable Compliance Method:

Monthly and rolling 12-month records demonstrating compliance with the facility wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).

Operational Restrictions

Throughput, and usage restrictions for toxic air pollutants as a result of the Ohio Air Toxics Policy.

Applicable Compliance Method:

Records shall be maintained demonstrating compliance with the throughput and usage limitations, along with ISCST3 Modeling results that indicate the operational restrictions are sufficient to meet the requirements of the Ohio Air Toxics Policy.

F. Miscellaneous Requirements

1. The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.
2. This permit allows the use of the materials specified by the permittee in the application for PTI number 16-1840. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation (s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the USEPA ISCST3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC TLV/42 and/or TLV/10 for pollutants that are restricted to a throughput of 2,000,000 gallons per month and a flow rate of 220 gallons per minute. The following summarizes the results of the modeling for each pollutant:

SEE Computer Modeling Results Submitted by the Permittee.

Physical changes or changes in method of operation of the emissions unit that results in changes to the factors affecting the air toxic analysis could result in the noncompliance with the permit to install (PTI 16-1840). In order to avoid this noncompliance situation prior to initiating any changes the permittee is required to conduct an evaluation to determine that the "Ohio Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. any changes in the composition of materials, or the use of materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled;
- c. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

The Ohio EPA will not consider any of the above mentioned as a modification requiring a PTI, if the following

conditions are met:

- a. the change is not otherwise considered a modification under OAC rule 3745-31;
 - b. the permittee can continue to comply with the allowable emissions limitations in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the change emissions unit still satisfies the Air Toxic Policy, and the Permittee maintains documentation that identifies the change and the results of the change of the Air Toxics Policy for the change.
3. For any change to the emissions unit or its method of operation that would require an increase in the emissions limitation established, or would otherwise be considered a modification under OAC rule 3745-31-01, the permittee shall obtain a final PTI prior to the change.
 4. If the Environmental Review Appeals Commission (ERAC) decision that this emissions unit is not subject to OAC rule 3745-21-07(G)(2) is overturned, emissions units P001, P004, P005, P006, P008, P009, and P010 shall comply with OAC rule 3745-21-07(G)(2). Appropriate record keeping and reporting requirements to demonstrate compliance with OAC rule 3745-21-07(G)(2) shall be developed for these emissions units at that time.

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

Facility ID: 1677130036 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>
8,500 gallon vertical, fixed roof, cone bottom blend tank (West)	OAC Rule 3745-31-05 PTI 16-1840 OAC Rule 3745-35-07(B)(1)	Compliance with the special terms and conditions of this permit. Facility-wide emissions shall be limited to: 69.9 TPY organic materials, 24.9 TPY hazardous air pollutants, 9.9 TPY any single HAP, (On a rolling 12-month basis.) See 2.a below.
	OAC Rule 3745-15-07	

2. Additional Terms and Conditions

- (a) The Permittee shall not emit or allow the escape into the open air any smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combination of substances in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property.
The Facility-wide emissions stated above shall include all the emissions from the Bulk facility and the warehouse facility combined.

B. Operational Restrictions

1. The emissions of organic compounds (VOC s) shall not exceed 69.9 tons per year for the entire facility as a rolling 12-month summation.
2. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.
3. The emissions of any one HAP shall not exceed 9.9 tons for the entire facility as a rolling 12-month summation.

4. The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.
 5. The following operation and physical restrictions at the facility were used in establishing the Realistic Worst Case Scenario for modeling and demonstrating compliance with the Ohio Air Toxics Policy.
 - a. The maximum pump rate permitted is 220 gallons per minute due to the size of the piping (3 inches.)
 - b. Even if multiple pumps are pumping material from different places into branches of the same line, the maximum rated throughput for that line shall be limited to 220 gallons per minute. And, conversely if two pumps are pumping material from two branches of the same line the total flow shall not exceed 220 gallons per minute.
 6. The total usage in the mixing tanks (P004, P005 and P006), combined of the below listed eight (8) chemicals, shall not exceed 1,788,750 gallons per calendar month for each of the chemicals listed below.
 - a. hydrogen peroxide
 - b. 2-methoxyethanol
 - c. acetic acid
 - d. n, n-dimethylformamide
 - e. furfural
 - f. 2-ethoxyethanol
 - g. n-pentane
 - h. n-hexane
 7. Operations involving the use of methylene chloride shall be restricted as follows:
 - a. No more than 573,750 gallons of methylene chloride shall be mixed in emissions unit P004 (inside mixing tank) to form blends.
 - b. There shall be no blends containing methylene chloride made in either of the outside blend tanks (P005 & P006).
 - c. The permittee shall include these restrictions in the Standard Operating Procedures(SOP) for the facility. A copy of the SOP shall be submitted to The Akron Regional Air Quality Management District within 90 days of the issuance of this permit.
- C. Monitoring and/or Record Keeping Requirements**
1. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).
 2. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
 3. The permittee shall collect and record the following information for each change where fair toxic modeling was required pursuant to the Ohio Air Toxic Policy:
 - a. background data that describes the parameters changed (compositionn of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still stifies the Ohio Air Toxic Policy; and
 - c. where computer modeling is performed , a copy of the resultiing computer model runs that show the results of the application of the Ait Toxics Policy for the change.
 4. The permittee shall collect and maintain records to demonstrate that the facility-wide mixing tank throughput of the inside and outside mixing tanks (P004, P005, and P006) does not exceed 1,788,750 gallons per month of the chemicals listed in B.6.
 5. The permittee shall collect and maintain records to demonstrate the compliance with the throughput of methylene chloride through the inside mixing tank (P004) does not exceed 573,750 gallons per month.
 6. The permittee shall collect and maintain records to demonstrate compliance with the throughput restriction of 40,000 gallons per day of volatile photochemically reactive material. These records shall be clearly discernible on the monthly recordkeeping data report.
- D. Reporting Requirements**
1. The permittee shall notify the Director in writing of any daily record showing an exceedance of any emission limitation or operating restriction. A copy of such record shall be sent to the Director within 60 days following the end of the calendar month.
 2. The permittee shall notify the Director in writing of any monthly record showing an exceedance of the facility-wide emission limitation for organic compounds, combined HAPs or any individual HAP, as set forth in B.1-3. A copy of such record shall be sent to the Director within 60 days following the occurrence.
 3. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAP's, and singal HAP's. The report

will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by June 15 of each year and shall cover the previous calendar year's activities.

4. The deviation reports shall be submitted in accordance with, and as required by the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods:

Emission Limitation:

The total facility-wide emissions of organic materials, and Hazardous Air Pollutants.

Applicable Compliance Method:

Monthly and rolling 12-month records demonstrating compliance with the facility wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).

Operational Restrictions

Throughput, and usage restrictions for toxic air pollutants as a result of the Ohio Air Toxics Policy.

Applicable Compliance Method:

Records shall be maintained demonstrating compliance with the throughput and usage limitations, along with ISCST3 Modeling results that indicate the operational restrictions are sufficient to meet the requirements of the Ohio Air Toxics Policy.

F. Miscellaneous Requirements

1. The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.

2. This permit allows the use of the materials specified by the permittee in the application for PTI number 16-1840. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation (s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the USEPA ISCST3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC TLV/42 and/or TLV/10 for pollutants that are restricted to a throughput of 2,000,000 gallons per month and a flow rate of 220 gallons per minute. The following summarizes the results of the modeling for each pollutant:

SEE Computer Modeling Results Submitted by the Permittee.

Physical changes or changes in method of operation of the emissions unit that results in changes to the factors affecting the air toxic analysis could result in the noncompliance with the permit to install (PTI 16-1840). In order to avoid this noncompliance situation prior to initiating any changes the permittee is required to conduct an evaluation to determine that the "Ohio Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- any changes in the composition of materials, or the use of materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled;
- any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

The Ohio EPA will not consider any of the above mentioned as a modification requiring a PTI, if the following conditions are met:

- the change is not otherwise considered a modification under OAC rule 3745-31;
 - the permittee can continue to comply with the allowable emissions limitations in its permit to install; and,
 - prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changes emissions unit still satisfies the Air Toxic Policy, and the Permittee maintains documentation that identifies the change and the results of the change of the Air Toxics Policy for the change.
3. For any change to the emissions unit or its method of operation that would require an increase in the emissions limitation established, or or would otherwise be considered a modification under OAC rule 3745-31-01, the permittee shall obtain a final PTI prior to the change.
4. If the Environmental Review Appeals Commission (ERAC) decision that this emissions unit is not subject to OAC rule 3745-21-07(G)(2) is overturned, emissions units P001, P004, P005, P006, P008, P009, and P010 shall comply with OAC rule 3745-21-07(G)(2). Appropriate record keeping and reporting requirements to demonstrate compliance with OAC rule 3745-21-07(G)(2) shall be developed for these emissions units at that time.

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

Facility ID: 1677130036 Emissions Unit ID: P006 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 gallon vertical, fixed roof, cone bottom blend tank (East)	OAC Rule 3745-31-05 PTI 16-1840 OAC Rule 3745-35-07(B)(1)	Compliance with the special terms and conditions of this permit. Facility-wide emissions shall be limited to: 69.9 TPY organic materials, 24.9 TPY hazardous air pollutants, 9.9 TPY any single HAP, (On a rolling 12-month basis.) See 2.a below.
	OAC Rule 3745-15-07	

2. Additional Terms and Conditions

- (a) The Permittee shall not emit or allow the escape into the open air any smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combination of substances in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property.
The Facility-wide emissions stated above shall include all the emissions from the Bulk facility and the warehouse facility combined.

B. Operational Restrictions

1. The emissions of organic compounds (VOC s) shall not exceed 69.9 tons per year for the entire facility as a rolling 12-month summation.
2. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.
3. The emissions of any one HAP shall not exceed 9.9 tons for the entire facility as a rolling 12-month summation.
4. The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.
5. The following operation and physical restrictions at the facility where used in establishing the Realistic Worst Case Scenario for modeling and demonstrating compliance with the Ohio Air Toxics Policy.
 - a. The maximum pump rate permitted is 220 gallons per minute due to the size of the piping (3 inches.)
 - b. Even if multiple pumps are pumping material from different places into branches of the same line, the maximum rated throughput for that line shall be limited to 220 gallons per minute. And, conversely if two pumps are pumping material from two branches of the same line the total flow shall not exceed 220 gallons per minute.
6. The total usage in the mixing tanks (P004, P005 and P006), combined of the below listed eight (8) chemicals, shall not exceed 1,788,750 gallons per calendar month for each of the chemicals listed below.
 - a. hydrogen peroxide
 - b. 2-methoxyethanol
 - c. acetic acid

d. n, n-dimethylformamide

e. furfural

f. 2-ethoxethanol

g. n-pentane

h. n-hexane

7. Operations involving the use of methylene chloride shall be restricted as follows:

a. No more than 573,750 gallons of methylene chloride shall be mixed in emissions unit P004 (inside mixing tank) to form blends.

b. There shall be no blends containing methylene chloride made in either of the outside blend tanks (P005 & P006).

c. The permittee shall include these restrictions in the Standard Operating Procedures(SOP) for the facility. A copy of the SOP shall be submitted to The Akron Regional Air Quality Management District within 90 days of the issuance of this permit.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).

2. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.

3. The permittee shall collect and record the following information for each change where tair toxic modeling was required pursuant to the Ohio Air Toxic Policy:

a. background data that describes the parameters changed (compositionn of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still stisfies the Ohio Air Toxic Policy; and

c. where computer modeling is performed , a copy of the resultuing computer model runs that show the results of the application of the Ait Toxics Policy for the change.

4. The permittee shall collect and maintain records to demonstrate that the facility-wide mixing tank throughput of the inside and outside mixing tanks (P004, P005, and P006) does not exceed 1,788,750 gallons per month of the chemicals listed in B.6.

5. The permittee shall collect and maintain records to demonstrate the compliance with the throughput of methylene chloride through the inside mixing tank (P004) does not exceed 573,750 gallons per month.

6. The permittee shall collect and maintain records to demonstrate compliance with the throughput restriction of 40,000 gallons per day of volatile photochemically reactive material. These records shall be clearly discernble on the monthly recordkeeping data report.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing an exceedance of any emission limitation or operating restriction. A copy of such record shall be sent to the Director within 60 days following the end of the calendar month.

2. The permittee shall notify the Director in writing of any monthly record showing an exceedance of the facility-wide emission limitation for organic compounds, combined HAPs or any individual HAP, as set forth in B.1-3. A copy of such record shall be sent to the Director within 60 days following the occurrence.

3. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAP's, and singal HAP's. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by June 15 of each year and shall cover the previous calendar year's activities.

4. The deviation reports shall be submitted in accordance with, and as required by the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in this permit shall be determined in accordance with the following methods:
Emission Limitation:

The total facility-wide emissions of organic materials, and Hazardous Air Pollutants.

Applicable Compliance Method:

Monthly and rolling 12-month records demonstrating compliance with the facility wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).

Operational Restrictions

Throughput, and usage restrictions for toxic air pollutants as a result of the Ohio Air Toxics Policy.

Applicable Compliance Method:

Records shall be maintained demonstrating compliance with the throughput and usage limitations, along with ISCST3 Modeling results that indicate the operational restrictions are sufficient to meet the requirements of the Ohio Air Toxics Policy.

F. Miscellaneous Requirements

1. The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.
2. This permit allows the use of the materials specified by the permittee in the application for PTI number 16-1840. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitation (s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) based on both the material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the USEPA ISCST3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC TLV/42 and/or TLV/10 for pollutants that are restricted to a throughput of 2,000,000 gallons per month and a flow rate of 220 gallons per minute. The following summarizes the results of the modeling for each pollutant:

SEE Computer Modeling Results Submitted by the Permittee.

Physical changes or changes in method of operation of the emissions unit that results in changes to the factors affecting the air toxic analysis could result in the noncompliance with the permit to install (PTI 16-1840). In order to avoid this noncompliance situation prior to initiating any changes the permittee is required to conduct an evaluation to determine that the "Ohio Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. any changes in the composition of materials, or the use of materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled;
- c. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

The Ohio EPA will not consider any of the above mentioned as a modification requiring a PTI, if the following conditions are met:

- a. the change is not otherwise considered a modification under OAC rule 3745-31;
 - b. the permittee can continue to comply with the allowable emissions limitations in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changes emissions unit still satisfies the Air Toxic Policy, and the Permittee maintains documentation that identifies the change and the results of the change of the Air Toxics Policy for the change.
3. For any change to the emissions unit or its method of operation that would require an increase in the emissions limitation established, or or would otherwise be considered a modification under OAC rule 3745-31-01, the permittee shall obtain a final PTI prior to the change.
 4. If the Environmental Review Appeals Commission (ERAC) decision that this emissions unit is not subject to OAC rule 3745-21-07(G)(2) is overturned, emissions units P001, P004, P005, P006, P008, P009, and P010 shall comply with OAC rule 3745-21-07(G)(2). Appropriate record keeping and reporting requirements to demonstrate compliance with OAC rule 3745-21-07(G)(2) shall be developed for these emissions units at that time.

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

Facility ID: 1677130036 Emissions Unit ID: P008 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 drumming line, for filling 55 gallon drums, consisting of a drumming station, hard and flexible piping and electric pumps.	OAC Rule 3745-31-05 PTI 16-1986 OAC Rule 3745-35-07(B)(1)	Compliance with the special terms and conditions of this permit. Facility-wide emissions shall be limited to: 69.9 TPY organic materials, 24.9 TPY hazardous air pollutants, 9.9 TPY any single HAP, (On a rolling 12-month basis.) See 2.a. below.
	OAC Rule 3745-15-07	

2. Additional Terms and Conditions

- (a) The Permittee shall not emit or allow the escape into the open air any smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combination of substances in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property.
The Facility-wide emissions stated above shall include all the emissions from the Bulk facility and the warehouse facility combined.

B. Operational Restrictions

1. The emissions of organic compounds (VOC s) shall not exceed 49.9 tons per year for the entire facility as a rolling 12-month summation.
2. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.
3. The emissions of any one HAP shall not exceed 9.9 tons for the entire facility as a rolling 12-month summation.
4. The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).
2. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.

D. Reporting Requirements

1. The permittee shall notify the Akron Regional Air Quality Management District in writing of any daily record showing an exceedance of any emission limitation(s) or operating restriction(s). A copy of such record shall be sent to the Akron Regional Air Quality Management District within 60 days following the occurrence. The report shall include (a) the probable cause of such deviations, and (b) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. The permittee need not file quarterly deviation reports as outlined in General Term and Condition A.2.b.
2. The permittee shall notify the Akron Regional Air Quality Management District in writing of any monthly record showing an exceedance of the facility-wide emission limitation for organic compounds, combined HAPs or any individual HAP, as set forth in B.1-3. A copy of such record shall be sent to the Akron Regional Air Quality Management District within 60 days following the occurrence. The reports shall include (a) the probable cause of such deviations, and (b) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. The permittee need not file quarterly deviation reports as outlined in General Term and Condition A.2.b.
3. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAP*s, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year's activities.

E. Testing Requirements

1. Compliance with the emission limitations in PTI #16-1986 shall be determined in accordance with the following methods:
Emission Limitation:

The total facility-wide emissions of organic materials, and Hazardous Air Pollutants.

Applicable Compliance Method:

Monthly and rolling 12-month records demonstrating compliance with the facility wide emissions of volatile

organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).

F. Miscellaneous Requirements

1. The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.
2. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires the permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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

Facility ID: 1677130036 Emissions Unit ID: P009 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>
Splash fill drumming line, for filling 55 gallon drums. consisting of a drumming station, hard and flexible piping and electric pumps.	OAC Rule 3745-31-05 PTI 16-1986	Compliance with the special terms and conditions of this permit.
	OAC Rule 3745-35-07(B)(1)	Facility-wide emissions shall be limited to: 69.9 TPY organic materials, 24.9 TPY hazardous air pollutants, 9.9 TPY any single HAP, (On a rolling 12-month basis.)
	OAC Rule 3745-15-07	See 2.a. below.

2. Additional Terms and Conditions

- (a) The Permittee shall not emit or allow the escape into the open air any smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combination of substances in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property.
The Facility-wide emissions stated above shall include all the emissions from the Bulk facility and the warehouse facility combined.

B. Operational Restrictions

1. The emissions of organic compounds (VOC s) shall not exceed 49.9 tons per year for the entire facility as a rolling 12-month summation.
2. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.
3. The emissions of any one HAP shall not exceed 9.9 tons for the entire facility as a rolling 12-month summation.
4. The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).
 2. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.
- D. Reporting Requirements**
1. The permittee shall notify the Akron Regional Air Quality Management District in writing of any daily record showing an exceedance of any emission limitation(s) or operating restriction(s). A copy of such record shall be sent to the Akron Regional Air Quality Management District within 60 days following the occurrence. The report shall include (a) the probable cause of such deviations, and (b) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. The permittee need not file quarterly deviation reports as outlined in General Term and Condition A.2.b.
 2. The permittee shall notify the Akron Regional Air Quality Management District in writing of any monthly record showing an exceedance of the facility-wide emission limitation for organic compounds, combined HAPs or any individual HAP, as set forth in B.1-3. A copy of such record shall be sent to the Akron Regional Air Quality Management District within 60 days following the occurrence. The reports shall include (a) the probable cause of such deviations, and (b) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. The permittee need not file quarterly deviation reports as outlined in General Term and Condition A.2.b.
 3. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAP's, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year's activities.
- E. Testing Requirements**
1. Compliance with the emission limitations in PTI #16-1986 shall be determined in accordance with the following methods:
Emission Limitation:

The total facility-wide emissions of organic materials, and Hazardous Air Pollutants.

Applicable Compliance Method:

Monthly and rolling 12-month records demonstrating compliance with the facility wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).
- F. Miscellaneous Requirements**
1. The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.
 2. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires the permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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

Facility ID: 1677130036 Emissions Unit ID: P010 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>
Splash fill tote and pail filling line, for filling 350 and 550 gallon totes and smaller containers. Consisting of a filling station, hard and flexible piping and electric pumps.	OAC Rule 3745-31-05 PTI 16-1986 OAC Rule 3745-35-07(B)(1)	Compliance with the special terms and conditions of this permit. Facility-wide emissions shall be limited to: 69.9 TPY organic materials, 24.9 TPY hazardous air pollutants, 9.9 TPY any single HAP, (On a rolling 12-month basis.) See 2.a. below.
	OAC Rule 3745-15-07	
2. Additional Terms and Conditions		
<p>(a) The Permittee shall not emit or allow the escape into the open air any smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combination of substances in such a manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property. The Facility-wide emissions stated above shall include all the emissions from the Bulk facility and the warehouse facility combined.</p>		
B. Operational Restrictions		
<p>1. The emissions of organic compounds (VOC s) shall not exceed 49.9 tons per year for the entire facility as a rolling 12-month summation.</p> <p>2. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.</p> <p>3. The emissions of all hazardous air pollutants (HAP s) combined shall not exceed 24.9 tons per year for the entire facility as a rolling 12-month summation.</p> <p>4. The permittee has sufficient records to demonstrate compliance with the rolling summation for the previous 12-months.</p>		
C. Monitoring and/or Record Keeping Requirements		
<p>1. The permittee shall maintain monthly and rolling 12-month records demonstrating compliance with the facility-wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).</p> <p>2. These records and all supporting data shall be retained in the company s files for a period of not less than five years and shall be made available to the Director or any authorized representative of the Director during normal business hours.</p>		
D. Reporting Requirements		
<p>1. The permittee shall notify the Akron Regional Air Quality Management District in writing of any daily record showing an exceedance of any emission limitation(s) or operating restriction(s). A copy of such record shall be sent to the Akron Regional Air Quality Management District within 60 days following the occurrence. The report shall include (a) the probable cause of such deviations, and (b) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. The permittee need not file quarterly deviation reports as outlined in General Term and Condition A.2.b.</p> <p>2. The permittee shall notify the Akron Regional Air Quality Management District in writing of any monthly record showing an exceedance of the facility-wide emission limitation for organic compounds, combined HAPs or any individual HAP, as set forth in B.1-3. A copy of such record shall be sent to the Akron Regional Air Quality Management District within 60 days following the occurrence. The reports shall include (a) the probable cause of such deviations, and (b) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. The permittee need not file quarterly deviation reports as outlined in General Term and Condition A.2.b.</p> <p>3. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility emissions of organic compounds, combined HAP*s, and individual HAPs. The report will also include a summary of any exceedances which occurred during the previous year. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year's activities.</p>		
E. Testing Requirements		
<p>1. Compliance with the emission limitations in PTI #16-1986 shall be determined in accordance with the following methods: Emission Limitation: The total facility-wide emissions of organic materials, and Hazardous Air Pollutants. Applicable Compliance Method: Monthly and rolling 12-month records demonstrating compliance with the facility wide emissions of volatile organic compounds, combined HAP s and individual HAP s from the entire facility (including fugitive emissions from pumps, valves and connectors).</p>		
F. Miscellaneous Requirements		
<p>1. The permittee shall not engage in cleaning tankers, storage tanks, railcars or drums unless emissions from such cleaning operations are included against the facility wide emissions limits established.</p>		

2. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires the permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.