



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

5/1/2009

Certified Mail

Mr. DEAN SARES  
UNIVAR USA INC - HAMILTON BRANCH  
1686 E HIGHLAND RD  
TWINSBURG, OH 44087

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1409040657  
Permit Number: P0104675  
Permit Type: OAC Chapter 3745-31 Modification  
County: Butler

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Journal News. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
122 South Front Street  
Columbus, Ohio 43215

and Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
HCDOES; Indiana; Kentucky

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Univar USA is a non-Title V industrial chemical and solvent re-packaging, storage, and distribution facility located in Butler County, Ohio. The facility has a variety of regulated air emission sources: chemical transport loading (EU P001), drum filling (EU P002), can filling (EU P003), solvent blending tanks (EUs P004 and P005), and numerous chemical storage tanks (EUs T001 – T024).

The permittee has requested a Chapter 31 modification of existing Permit to Install (PTI) No. 14-02022, originally issued in 1995, for EUs P001, P002, and P003. The product mix and material throughput operating restrictions established in the original 1995 permitting action for P001, P002, and P003 are no longer representative of company operations. Using the current and projected product mix at the facility and the updated emissions factors found in Chapter 5.2 of AP-42, the permittee is proposing in this modification to increase material throughput rates and increase emission rates such that they will be representative of maximum potential to emit and provide the permittee with greater flexibility regarding changes to product mix at the facility.

3. Facility Emissions and Attainment Status:

Regulated emissions consist of organic compounds (OC), volatile organic compounds (VOC), and hazardous air pollutants (HAPs). The facility is currently subject to synthetic minor facility-wide 9.9/24.9 ton per year (TPY) HAP limitations to avoid MACT Subpart EEEE and Title V. The facility is not a major OC/VOC stationary source based on facility-wide uncontrolled PTE for these pollutants. Butler County is non-attainment for VOCs (8-hour ozone standard), non-attainment for PM<sub>2.5</sub>, and attainment for all other criteria pollutants. Actual facility-wide OC/VOC emissions in 2008 were 1.6 TPY and HAP emissions were 0.2 TPY for the highest individual HAP and 1.12 TPY for combined HAPs.

4. Source Emissions:

In this permit action, the annual material throughput rates provided by the permittee will ensure that P001, P002, and P003 shall each not exceed 10 tons per year TPY for OC/VOC emissions (VOC was assumed to be equal to OC). Specifically, in this permit action, the annual allowable emission rates of OC/VOC will increase for these emission units as follows:

	<u>PTI No. 14-02022</u>	<u>FEPTIO No. P0104675</u>	<u>Emissions Increase (TPY)</u>
P001	5.7 TPY OC	9.8 TPY OC	4.1
P002	7.3 TPY OC	9.3 TPY OC	2.0
P003	7.3 TPY OC	9.8 TPY OC	2.5

The existing facility-wide synthetic minor HAP emission limitations of 9.9/24.9 TPY will remain unchanged. The modification will still not subject the facility to major OC/VOC stationary source status based on facility-wide uncontrolled PTE for these pollutants which will increase from 35 TPY to 44 TPY.

5. Conclusion:

The permittee has proposed to comply with the federally enforceable emission limitations of 9.9/24.9 TPY HAPs as 12-month rolling summations and will accept the terms and conditions of this permit which will limit emissions of HAPs as a Synthetic Minor so that the facility will not trigger Title V and MACT Subpart EEEE applicability. The facility will maintain records and be subject to reporting as outlined in the permit to ensure compliance with the voluntary synthetic minor emission limitations.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>OC/VOC</u>	<u>28.9</u>
<u>Individual HAPs (facility-wide)</u>	<u>9.9</u>
<u>Combined HAPs (facility-wide)</u>	<u>24.9</u>

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
UNIVAR USA INC - HAMILTON BRANCH

Issue Date: 5/1/2009  
Permit Number: P0104675  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Description: Chapter 31 Modification of PTI 14-02022 to Increase Material Throughput and Emission Rates for Emission Units P001, P002, and P003  
Facility ID: 1409040657  
Facility Location: UNIVAR USA INC - HAMILTON BRANCH  
12 Standen Drive,  
Hamilton, OH 45015  
Facility Description: Other Chemical and Allied Products Merchant Wholesalers

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Paul Tedtman at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy. or (513)946-7777. The permit can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**DRAFT**

**Air Pollution Permit-to-Install and Operate  
for  
UNIVAR USA INC - HAMILTON BRANCH**

Facility ID: 1409040657  
Permit Number: P0104675  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 5/1/2009  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install and Operate**  
for  
UNIVAR USA INC - HAMILTON BRANCH

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104675

**Facility ID:** 1409040657

**Effective Date:** To be entered upon final issuance

# Authorization

Facility ID: 1409040657  
Application Number(s): A0037260  
Permit Number: P0104675  
Permit Description: Chapter 31 Modification of PTI 14-02022 to Increase Material Throughput and Emission Rates for Emission Units P001, P002, and P003  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$3,000.00 *DO NOT send payment at this time - subject to change before final issuance*  
Issue Date: 5/1/2009  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

UNIVAR USA INC - HAMILTON BRANCH  
12 Standen Drive  
Hamilton, OH 45015

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660  
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104675

**Facility ID:** 1409040657

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0104675

Permit Description: Chapter 31 Modification of PTI 14-02022 to Increase Material Throughput and Emission Rates for Emission Units P001, P002, and P003

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Transport Loading
Superseded Permit Number:	14-02022
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	Drum Loading
Superseded Permit Number:	14-02022
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	Can Filling
Superseded Permit Number:	14-02022
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104675

**Facility ID:** 1409040657

**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Hamilton County Dept. of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104675

**Facility ID:** 1409040657

**Effective Date:** To be entered upon final issuance

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104675

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## **B. Facility-Wide Terms and Conditions**



1. 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).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 2., 3., 4., and 5.
2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from the Univar USA Hamilton Branch (Premise 1409040657) emissions units P001 (Transport Loading Operation), P002 (Drum Loading Operation), P003 (Can Filling Operation), P004 (Solvent Blending No. 1), P005 (Solvent Blending No. 2), T001 – T024 (Storage Tanks), other de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 tons per year (TPY) for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records of existing sources to demonstrate compliance with this limitation upon issuance of this permit.
3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:
  - a) The name and identification number of each product or material processed or employed including solvents stored, solvents blended, and solvents packaged;
  - b) The individual HAP\* content for each HAP of each solvent, in pounds of individual HAP per gallon of solvent, as processed or employed;
  - c) The total combined HAP content of each solvent in pounds of combined HAPs per gallon of solvent, as processed or employed [sum all the individual HAP contents from b)];
  - d) The number of gallons of each solvent processed or employed;
  - e) The total individual HAP emissions for each HAP from all solvents processed or employed, in pounds or tons per month [for each HAP the sum of b) times d) times the appropriate emission factor for each organic solvent];
  - f) The total combined HAP emissions from all solvents processed or employed, in pounds or tons per month [the sum of c) times d) times the appropriate emission factor for each organic solvent];



- g) The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- h) The updated rolling, 12-month summation of emissions for total combined HAPs, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Hamilton County Department of Environmental Services.

- 4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations specified in 2. above. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
- 5. Compliance with the emission limitations in 2. of these terms and conditions shall be determined in accordance with the following method(s) identified below:

- a) Emission Limitations:

Actual emissions of Hazardous Air Pollutants (HAPs) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, as a 12-month rolling summation, as specified in 2. above.

Applicable Compliance Method:

Compliance with the 12-month rolling HAP limitations shall be demonstrated by the record keeping identified in 3. above.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0104675

**Facility ID:** 1409040657

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. P001, Transport Loading**

**Operations, Property and/or Equipment Description:**

Transport Loading Operation - Modification

a) 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. g)(1).

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(E)  Voluntary Restriction to Avoid BAT	See b)(2)a.
b.	OAC rule 3745-31-05(D)  Synthetic Minor to Avoid 40 CFR 63 Subpart EEEE and Title V	See Section B.2.

(2) Additional Terms and Conditions

a. Federally Enforceable Permit to Install and Operate (FEPTIO) No. P0104675 for this air contaminant source takes into account the following voluntary restrictions, as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

i. the maximum annual material throughput rates for this emissions unit shall not exceed:

(a) 3,000,000 gallons per year of Group A\* chemical products;

(b) 7,000,000 gallons per year of Group B\* chemical products;



(c) 40,000,000 gallons per year of Group C\* chemical products; and

ii. the organic compound (OC) emissions and volatile organic compound (VOC) emissions shall each not exceed 9.8 tons per year.

\*See f)(1)a. of these terms and conditions for definitions of the Group A, B, and C chemical product categories.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information annually for the purpose of determining annual OC emissions:

- a. the name and identification of each solvent processed or employed, including whether the solvent is categorized as a Group A, B, or C chemical product;
- b. the molecular weight, in lb/lb-mole, and the vapor pressure, in psia, for each solvent processed or employed;
- c. the number of gallons of each solvent processed or employed;
- d. the total number of gallons of all solvents processed or employed in each chemical product category (Groups A, B, and C); and
- e. the total OC emissions from all solvents processed or employed, in tons, using the calculation methods provided in f)(1)a. of these terms and conditions and replacing the voluntary restriction amounts with the actual amounts as recorded above in d)(1)b. and d)(1)c. VOC emissions are assumed to be equal to the OC emissions.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) See Section B.4. of this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:



a. Emission Limitation:

Voluntary restrictions to ensure OC and VOC emissions do not exceed 9.8 tons per year.

Applicable Compliance Method:

The annual OC and VOC emissions voluntary restriction was developed from the following equations using US EPA AP-42 *Chapter 5.2 Transportation and Marketing of Petroleum Liquids*, revised 6/2008, and the information contained in the permittee's application for FEPTIO No. P0104675, submitted on March 20, 2009:

Loading Loss ( $L_L$ ) of each solvent, in pounds/1000 gallons throughput =

$$12.46 (SPM)/T$$

where,

S = saturation factor of 0.50 (ref. AP-42 Table 5.2-1, 6/2008)

P = vapor pressure of the material transferred, in psia

M = molecular weight of the material transferred, in lbs per lb-mole

T = temperature of material transferred, in degrees Rankin

Emissions, in tons per year = ( $L_L$  of worst case solvent in Group A at 2.386 lbs/1000 gals of solvent transferred x 3,000,000 gallons per year maximum throughput of Group A chemical products) + ( $L_L$  of worst case solvent in Group B at 1.098 lbs/1000 gals of solvent transferred x 7,000,000 gallons per year maximum throughput of Group B chemical products) + ( $L_L$  of worst case solvent in Group C at 0.117 lbs/1000 gals of solvent transferred x 40,000,000 gallons per year maximum throughput of Group C chemical products) x (1 ton/2000 lbs) = 9.8 tons per year OC

Group A chemical products are defined as having a value greater than 100 from the multiplication of the molecular weight (M) and the vapor pressure (P) in the equation above.

Group B chemical products are defined as having a value greater than 10 and less than or equal to 100 from the multiplication of the molecular weight (M) and the vapor pressure (P) in the equation above.

Group C chemical products are defined as having a value less than or equal to 10 from the multiplication of the molecular weight (M) and the vapor pressure (P) in the equation above.

VOC was assumed to be equal to the OC emissions.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be



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less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO 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 cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

- (2) The terms and conditions of this permit to install and operate shall supersede the terms and conditions of permit to install 14-02022 issued on April 27, 1995, and revised June 26, 2007.



**2. P002, Drum Loading**

**Operations, Property and/or Equipment Description:**

Drum Loading Operation - Modification

a) 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. g)(1).

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(E)  Voluntary Restriction to Avoid BAT	See b)(2)a.
b.	OAC rule 3745-31-05(D)  Synthetic Minor to Avoid 40 CFR 63 Subpart EEEE and Title V	See Section B.2.

(2) Additional Terms and Conditions

a. Federally Enforceable Permit to Install and Operate (FEPTIO) No. P0104675 for this air contaminant source takes into account the following voluntary restrictions, as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

i. the maximum annual material throughput rates for this emissions unit shall not exceed:

(a) 1,000,000 gallons per year of Group A\* chemical products;

(b) 4,000,000 gallons per year of Group B\* chemical products;



(c) 95,000,000 gallons per year of Group C\* chemical products; and

ii. the organic compound (OC) emissions and volatile organic compound (VOC) emissions shall each not exceed 9.3 tons per year.

\*See f)(1)a. of these terms and conditions for definitions of the Group A, B, and C chemical product categories.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information annually for the purpose of determining annual OC emissions:

- a. the name and identification of each solvent processed or employed, including whether the solvent is categorized as a Group A, B, or C chemical product;
- b. the molecular weight, in lb/lb-mole, and the vapor pressure, in psia, for each solvent processed or employed;
- c. the number of gallons of each solvent processed or employed;
- d. the total number of gallons of all solvents processed or employed in each chemical product category (Groups A, B, and C); and
- e. the total OC emissions from all solvents processed or employed, in tons, using the calculation methods provided in f)(1)a. of these terms and conditions and replacing the voluntary restriction amounts with the actual amounts as recorded above in d)(1)b. and d)(1)c. VOC emissions are assumed to be equal to the OC emissions.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) See Section B.4. of this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:



a. Emission Limitation:

Voluntary restrictions to ensure OC and VOC emissions do not exceed 9.3 tons per year.

Applicable Compliance Method:

The annual OC and VOC emissions voluntary restriction was developed from the following equations using US EPA AP-42 *Chapter 5.2 Transportation and Marketing of Petroleum Liquids*, revised 6/2008, and the information contained in the permittee's application for FEPTIO No. P0104675, submitted on March 20, 2009:

Loading Loss ( $L_L$ ) of each solvent, in pounds/1000 gallons throughput =

$$12.46 (SPM)/T$$

where,

S = saturation factor of 0.50 (ref. AP-42 Table 5.2-1, 6/2008)

P = vapor pressure of the material transferred, in psia

M = molecular weight of the material transferred, in lbs per lb-mole

T = temperature of material transferred, in degrees Rankin

Emissions, in tons per year = ( $L_L$  of worst case solvent in Group A at 3.022 lbs/1000 gals of solvent transferred x 1,000,000 gallons per year maximum throughput of Group A chemical products) + ( $L_L$  of worst case solvent in Group B at 1.098 lbs/1000 gals of solvent transferred x 4,000,000 gallons per year maximum throughput of Group B chemical products) + ( $L_L$  of worst case solvent in Group C at 0.118 lbs/1000 gals of solvent transferred x 95,000,000 gallons per year maximum throughput of Group C chemical products) x (1 ton/2000 lbs) = 9.3 tons per year OC

Group A chemical products are defined as having a value greater than 100 from the multiplication of the molecular weight (M) and the vapor pressure (P) in the equation above.

Group B chemical products are defined as having a value greater than 10 and less than or equal to 100 from the multiplication of the molecular weight (M) and the vapor pressure (P) in the equation above.

Group C chemical products are defined as having a value less than or equal to 10 from the multiplication of the molecular weight (M) and the vapor pressure (P) in the equation above.

VOC was assumed to be equal to the OC emissions.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the A Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be



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less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO 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 cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

- (2) The terms and conditions of this permit to install and operate shall supersede the terms and conditions of permit to install 14-02022 issued on April 27, 1995, and revised June 26, 2007.



3. P003, Can Filling

Operations, Property and/or Equipment Description:

Can Filling Operation - Modification

a) 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. g)(1).

(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.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(E)  Voluntary Restriction to Avoid BAT	See b)(2)a.
b.	OAC rule 3745-31-05(D)  Synthetic Minor to Avoid 40 CFR 63 Subpart EEEE and Title V	See Section B.2.

(2) Additional Terms and Conditions

a. Federally Enforceable Permit to Install and Operate (FEPTIO) No. P0104675 for this air contaminant source takes into account the following voluntary restrictions, as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A(3):

i. the maximum annual material throughput rates for this emissions unit shall not exceed:

(a) 1,500,000 gallons per year of Group A\* chemical products;

(b) 1,500,000 gallons per year of Group B\* chemical products;



(c) 5,000,000 gallons per year of Group C\* chemical products; and

ii. the organic compound (OC) emissions and volatile organic compound (VOC) emissions shall each not exceed 9.8 tons per year.

\*See f)(1)a. of these terms and conditions for definitions of the Group A, B, and C chemical product categories.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information annually for the purpose of determining annual OC emissions:

- a. the name and identification of each solvent processed or employed, including whether the solvent is categorized as a Group A, B, or C chemical product;
- b. the molecular weight, in lb/lb-mole, and the vapor pressure, in psia, for each solvent processed or employed;
- c. the number of gallons of each solvent processed or employed;
- d. the total number of gallons of all solvents processed or employed in each chemical product category (Groups A, B, and C); and
- e. the total OC emissions from all solvents processed or employed, in tons, using the calculation methods provided in f)(1)a. of these terms and conditions and replacing the voluntary restriction amounts with the actual amounts as recorded above in d)(1)b. and d)(1)c. VOC emissions are assumed to be equal to the OC emissions.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) See Section B.4. of this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:



a. Emission Limitation:

Voluntary restrictions to ensure OC and VOC emissions do not exceed 9.8 tons per year.

Applicable Compliance Method:

The annual OC and VOC emissions voluntary restriction was developed from the following equations using US EPA AP-42 *Chapter 5.2 Transportation and Marketing of Petroleum Liquids*, revised 6/2008, and the information contained in the permittee's application for FEPTIO No. P0104675, submitted on March 20, 2009:

Loading Loss ( $L_L$ ) of each solvent, in pounds/1000 gallons throughput =

$$12.46 (SPM)/T$$

where,

S = saturation factor of 1.45 (ref. AP-42 Table 5.2-1, 6/2008)

P = vapor pressure of the material transferred, in psia

M = molecular weight of the material transferred, in lbs per lb-mole

T = temperature of material transferred, in degrees Rankin

Emissions, in tons per year = ( $L_L$  of worst case solvent in Group A at 8.764 lbs/1000 gals of solvent transferred x 1,500,000 gallons per year maximum throughput of Group A chemical products) + ( $L_L$  of worst case solvent in Group B at 3.185 lbs/1000 gals of solvent transferred x 1,500,000 gallons per year maximum throughput of Group B chemical products) + ( $L_L$  of worst case solvent in Group C at 0.34 lbs/1000 gals of solvent transferred x 5,000,000 gallons per year maximum throughput of Group C chemical products) x (1 ton/2000 lbs) = 9.8 tons per year OC

Group A chemical products are defined as having a value greater than 100 from the multiplication of the molecular weight (M) and the vapor pressure (P) in the equation above.

Group B chemical products are defined as having a value greater than 10 and less than or equal to 100 from the multiplication of the molecular weight (M) and the vapor pressure (P) in the equation above.

Group C chemical products are defined as having a value less than or equal to 10 from the multiplication of the molecular weight (M) and the vapor pressure (P) in the equation above.

VOC was assumed to be equal to the OC emissions.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the A Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be



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less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO 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 cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

- (2) The terms and conditions of this permit to install and operate shall supersede the terms and conditions of permit to install 14-02022 issued on April 27, 1995, and revised June 26, 2007.