State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
ASHTABULA COUNTY
Application No: 02-05971
Fac ID: 0204010056
DATE: 9/22/2005

ASHTA Chemicals, Inc.
John Reese
P. O. Box 858
Ashtabula, OH 440050858

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **$ 100** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA NEDO

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install | **Issue Date: To be entered upon final issuance**
Terms and Conditions | **Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 02-05971

Application Number:	**02-05971**
APS Premise Number:	**0204010056**
Permit Fee:	**$ To be entered upon final issuance**
Name of Facility:	**ASHTA Chemicals, Inc.**
Person to Contact:	**John Reese**
Address:	**P. O. Box 858** **Ashtabula, OH 440050858**

Location of proposed air contaminant source(s) [emissions unit(s)]:
3509 Middle Rd.
Ashtabula, **OHIO**

Description of modification:
Administrative modification to PTI 02-05971 to increase the allowable SO2 and CO emission rates

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

PERMIT TO INSTALL FEE

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

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

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

ASHTA Chemicals, Inc. Facility ID: **0204010056**
PTI Application: 02-05971
Modification Issued: To be entered upon final issuance

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

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

Ohio EPA Source Number	Source Identification Description	BAT Determination
B001	9.7 mmBtu/hr natural gas and hydrogen boiler - administrative modification of PTI 02-5971 issued on October 30, 1991.	Use of natural gas or waste hydrogen gas as the fuel
T002	6,100 gallon storage tank for chloropicrin	
P004	Chloropicrin process	

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
	or and a carbon absorber unit			
		Applicable Federal & OAC Rules	3745-31-05(A)(3) 3745-21-07 (D)(2)	
		3745-31-05(A)(3)		
Use of a submerged fill pipe installed within six (6) inches from the bottom of the tank and use of a vapor capture system			3745-31-05(A)(3) 3745-21-07(B) Use of natural gas or waste hydrogen gas as the fuel	
		3745-17-07(A)		
		3745-17-10 (B)(1)		
		3745-21-08(B) 3745-23-06(B)		
		40 CFR 61.50-61.56		
Use of a condens		40 CFR 63.8180-63.8266		

ASHTA Chemicals, Inc. Facility ID: **0204010056**
PTI Application: 02-05971
Modification Issued: To be entered upon final issuance

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
	e (CO) emissions shall not exceed 0.81 lb/hr and 3.55 tons/year. The nitrogen oxide(s) (NO_X) emissions shall not exceed 0.97 lb/hr and 7.65 tons/yr. The mercury emissions shall not exceed 0.039 lb/hr and 0.17 ton/year. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-17-10(B)(1) and with the requirements of 40 CFR 61.50-61.56 and 40 CFR 63.8180-63.8266. The visible PE rate shall not exceed 20% opacity as a 6-minute average, except as specified by rule.	The PE rate shall not exceed 0.020 lb/mmBtu. See additional special term 1.a. See additional special term 1.b. The mercury emissions shall not exceed 2.3 kg (5.1 lb) per 24-hour period from the mercury cell chlor-alkali plant. See additional special term 1.c. The mercury emissions shall not exceed 0.076 gram of mercury (Hg) per megagram of chlorine (Cl_2) produced (1.5×10^{-4} lb Hg/ton Cl_2) from all by-product hydrogen streams and all end box ventilation system vents. See additional special terms 1.d. through 1.h. The chloropicrin emissions shall be limited to less than 0.1 ton/year. The chloropicrin emissions shall not exceed 0.14 lb/hr and 0.60 ton/year.		
Permit Allowable Mass Emissions and/or Control/ Usage Requirements The sulfur dioxide (SO_2) emissions shall not exceed 0.006 lb/hr and 0.025 ton/year. The particulate emissions (PE) rate shall not exceed 1 ton/year. The carbon monoxid				

ASHTA Chemicals, Inc. Facility ID: **0204010056**
PTI Application: 02-05971
Modification Issued: To be entered upon final issuance

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons/Year	Tons/Year Increase
SO_2	0.025	0.005
TSP	<1	0
NO_X	7.65	0
CO	3.55	2.55
Mercury	0.17	0
Chloropicrin	<0.70	0

NSPS REQUIREMENTS

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

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

Source Number	**Source Description**	**NSPS Regulation (Subpart)**
B001	9.7 mmBtu/hr natural gas and hydrogen boiler	40 CFR 61.50 - 61.56

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

a. construction date (no later than 30 days after such date);
b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
c. actual start-up date (within 15 days after such date); and
d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and NEDO

NESHAP REQUIREMENTS

The following source(s) are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

Source Number	**Source Description**
Begin text here	Begin text here

ASHTA Chemicals, Inc. Facility ID: **0204010056**
PTI Application: 02-05971
Modification Issued: To be entered upon final issuance

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
NESHAP Regulation (Subpart)				
Begin text here				

The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 61 are also federally enforceable.

Pursuant to the NESHAP, the source owner/operator is required to report the following milestones:

a. date of commencement of construction (no later than 30 days after such date);
b. anticipated date of initial start-up (not more than 60 days or less than 30 days prior to such date);
c. actual date of initial start-up (within 15 days after such date); and
d. date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and **NEDO**

RADIONUCLIDES NESHAP REQUIREMENTS

The following source(s) are subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 61.

Source Number		**Source Description**
	Begin text here	

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

Begin text here **NESHAP**

Begin text here

The application and enforcement of these standards are performed by the United States Environmental Protection Agency.

Pursuant to the NESHAP, the source owner/operator is required to report the following milestones:

a. date of commencement of construction (no later than 30 days after such date);
b. anticipated date of initial start-up (not more than 60 days or less than 30 days prior to such date);
c. actual date of initial start-up (within 15 days after such date); and
d. date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

United States Environmental Protection Agency
David Kee
Air & Radiation Branch (5AR-26)
230 South Dearborn Street
Chicago, IL 60604

and Ohio Environmental Protection Agency
DAPC - Air Quality Modeling and Planning
P.O. Box 1049
Columbus, OH 43216-1049

and **NEDO**

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.

B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.

C. Tests shall be performed for the following source(s) and pollutants(s):

Source	**Pollutant(s)**
Enter Text here	**Enter text here**

MONITORING REQUIREMENTS

A **< **MONITOR TYPE/NAME** >** monitor shall be installed on the **< **EMISSIONS UNIT ID** >** . The monitoring equipment shall be installed and maintained in accordance with the applicable portions of 40 CFR part 60 - Standards of Performance for New Stationary Sources.

Within 30 days after the installation of the continuous monitoring and recording equipment, this facility shall conduct a performance specification test of such equipment pursuant to Section 3704.03(I) of the Ohio Revised Code and 40 CFR Part 60, Appendix B, Performance Specification Test 1. Personnel from the Ohio EPA field office shall be permitted to witness the performance specification test, and two copies of the test results shall be submitted to the Ohio EPA field office within 45 days after the test is completed.

Pursuant to 40 CFR Parts 60.7 and 60.13(h), this facility shall submit reports on a quarterly basis to the Ohio EPA field office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07 or any limitations specified in the terms and conditions of this permit. These quarterly excess emission

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

reports shall be submitted by February 1, May 1, August 1, and November 1 of each year and shall cover the data obtained during the previous calendar quarters.

PSD REQUIREMENTS

The source described in this Permit to Install is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency 40 CFR 52.21. The authority to apply and enforce the PSD regulations has been delegated to the Ohio Environmental Protection Agency. The terms and conditions of this permit and the requirements of the PSD regulations are also enforceable by the United States Environmental Protection Agency.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply: (1) the effective date of this permit shall be 30 days after the service of notice to any public commentors of the final decision to issue, modify, or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service of notice; and (2) if an appeal is made to the Administrator of the United States Environmental Protection Agency, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

APPENDIX S - EMISSION OFFSET INTERPRETATIVE RULING

The source described in this Permit to Install is subject to the applicable provisions of the Interpretative Ruling on Emission Offsets by the United States Environmental Protection Agency, 40 CFR 51, Appendix S. The terms and conditions of this permit and the requirements of the Interpretative Ruling are also enforceable by the United states Environmental Protection Agency.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to**NEDO.**

WASTE DISPOSAL

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

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

MAINTENANCE OF EQUIPMENT

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

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **NEDO.**

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

AIR POLLUTION NUISANCES PROHIBITED

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

NINETY DAY OPERATING PERIOD

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

GASOLINE DISPENSING FACILITIES

BAT for any gasoline dispensing operation identified within this permit consists of the use of Stage I vapor balance system. The vapor balance system shall be designed and operated to route at least 90% by weight of the organic compounds in the displaced vapors from the storage tanks to the delivery vessel and shall be equipped with a means to prevent the discharge into the atmosphere of displaced vapors from an unconnected vapor line. This shall be used at all times when filling the tanks.

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

The transfer of gasoline from a delivery vessel to a stationary storage tank shall be conducted by use of submerged fill into the storage tank. The submerged fill pipe(s) are to be installed so they are within six (6) inches of the bottom of the storage tank.
This facility shall be serviced by a bulk gasoline plant or terminal that is in compliance with OAC Rule 3745-21-09(P) or (Q), respectively.

There shall be no leaks in the vapor and liquid lines during the transfer of gasoline.

All fill caps shall be "in place" and clamped during normal storage conditions.

The gasoline dispensing facility shall repair within 15 days any leaks from the vapor balance system which is employed to meet the requirements of Paragraph (A)(3) of OAC Rule 3745-31-05 or Paragraph (R)(1) of OAC Rule 3745-21-09 when such leaks are equal to or greater than 100% of the lower explosive limit of propane, as determined under Paragraph (K) of OAC Rule 3745-21-10.

DIESEL AND/OR KEROSENE DISPENSING FACILITIES

BAT for any diesel and/or kerosene dispensing operation identified within this permit consists of the transfer of diesel and/or kerosene from a delivery vessel to a stationary storage tank through the use of submerged filling into the storage tank. The submerged fill pipe(s) are to be installed so they are within six (6) inches of the bottom of the storage tank.

GASOLINE DISPENSING OPERATIONS

BAT for the gasoline dispensing operation identified within this permit consists of the transfer of gasoline from a delivery vessel to a stationary storage tank through the use of submerged filling into the storage tank and the restriction of annual throughput to *****ENTER MAXIMUM GALLONS***** gallons of gasoline per year. The submerged fill pipe(s) are to be installed so they are within six (6) inches of the bottom of the storage tank.

MISCELLANEOUS STORAGE TANKS

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

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS),

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

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

Source Number(s)	Tank Size
Enter text here	Enter text here

In addition,

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

Source Number(s)	Tank Size
Enter text here	Enter text here

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

Source Number(s)	Tank Size
Enter text here	Enter text here

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

C. Other Applicable Rules:

Source Number(s)	Tank Size
Enter text here	Enter text here

BAT FOR OPEN TOP VAPOR DEGREASERS

In accordance with OAC Rule 3745-21-09(0)(3), each owner or operator of an open top vapor degreaser shall:

a. equip the open top vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;

b. install the following safety switches:

1. a condenser flow switch and thermostat or any other device which shuts off the sump heat if the condenser is either not circulating or too warm;

2. a spray safety switch which shuts off the spray pump if the vapor level drops below any fixed spray nozzle;

3. a vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high; and

4. a water flow switch, water pressure switch or any other device which shuts off the sump heat if the water in a water-cooled condenser has no flow or no pressure, whichever is being monitored;

c. install one of the following devices:

1. a freeboard with a freeboard ratio greater than or equal to 0.75 - if the open top vapor degreaser opening is greater than 10 square feet, the cover must be powered or equipped with mechanical features whereby it can be readily closed when the degreaser is not in use;

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

2. refrigerated chiller;

3. enclosed design (cover or door opens only when the dry part is actually entering or exiting the open top vapor degreaser);

4. carbon adsorption system, with ventilation greater than or equal to 50 cubic feet per minute per square foot of air/solvent interface (when cover is open), and exhausting less than 25 parts per million (ppm) of solvent averaged over one complete adsorption cycle; or

5. a control system, demonstrated to have control efficiency equivalent to or greater than any of the above, and approved by the Director; and

d. operate and maintain the open top vapor degreaser in a manner which is consistent with good engineering practice and which minimizes solvent evaporation from the unit.

BAT FOR COLD CLEANERS

In accordance with OAC Rule 3745-21-09(0)(2), each owner or operator of a cold cleaner shall:

a. equip the cold cleaner with either:

1. a cover - if the solvent has a vapor pressure greater than 0.3 pound per square inch absolute measured at 100ºF or the solvent is heated or agitated, the cover shall be signed and constructed so that it can be easily operated with one hand; or

2. a remote solvent reservoir from which solvent is pumped through a nozzle suspended over a sink-like work area which drains back to the reservoir, provided a sink-like work area has an open drain area of less than 16 square inches and provided the solvent is neither heated above 120ºF nor has a vapor pressure greater than 0.6 pound per square inch absolute, measured at 100ºF;

b. equip the cold cleaner with a device for draining the cleaned parts - if the solvent has a vapor pressure greater than 0.6 pound per square inch absolute measured at 100ºF, the drainage facility shall be constructed internally so that parts are enclosed under the cover during draining, unless an internal type drainage device cannot fit into the cleaning system;

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

c. install one of the following devices if the solvent vapor pressure is greater than 0.6 pound per square inch absolute measured at 100°F, or if the solvent is heated above 120°F;

1. freeboard that gives a freeboard ratio greater than or equal to 0.7;

2. water cover (solvent must be insoluble in and heavier than water); or

3. other systems of equivalent control, such as refrigerated chiller or carbon adsorption, approved by the Director; and

d. operate and maintain the cold cleaner in a manner which is consistent with good engineering practice and which minimizes solvent evaporation from the unit.

BAT FOR CONVEYORIZED DEGREASERS

In accordance with OAC Rule 3745-21-09(0)(4), each owner or operator of a conveyorized degreaser shall:

a. install one of the following devices on all conveyorized degreasers having an air/solvent interface greater than 22 square feet;

1. refrigerated chiller;

2. carbon adsorption system, with ventilation greater than or equal to 50 cubic feet per minute per square foot of air/solvent interface (when downtime covers are open), and exhausting less than 25 parts per million (ppm) of solvent by volume averaged over a complete adsorption cycle; or

3. a system demonstrated to have a control efficiency equivalent to or greater than Paragraph (0)(4)(a)(i) or (0)(4)(a)(ii) of this Rule, and approved by the Director;

b. equip the conveyorized degreaser with equipment (such as a drying tunnel or rotating (tumbling basket) sufficient to prevent cleaned parts from carrying out solvent liquid or vapor;

c. install one of the following safety switches, if the solvent is heated to its boiling point:

1. a condensor flow switch and thermostat or any other device which shuts off the sump heat if the condensor coolant is either not circulating or too warm;

2. a spray safety switch which shuts off the spray pump if the vapor level drops below any fixed

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
	spray nozzle; and			

3. a vapor level control thermostat or any other device which shuts off the sump heat when the vapor level rises too high;

d. equip the conveyorized degreaser with covers for closing off the entrance and exit when not in use; and

e. operate and maintain the conveyorized degreaser in a manner which is consistent with good engineering practice and which minimizes solvent evaporation from the unit.

NOTICE OF INTENT TO RELOCATE

Pursuant to OAC Rule 3745-31-03(A)(1)(n), the owner or operator of the portable or mobile source identified within this Permit to Install may relocate within the state of Ohio without first obtaining a Permit to Install providing the following criteria are met:

a. the source is equipped with the Best Available Control Technology for such source;

b. the source is operating pursuant to a currently effective Permit to Operate;

c. the applicant has provided proper notice of intent to relocate the source to the Director within a minimum of 30 days prior to the scheduled relocation; and

d. in the Director's judgement, the proposed site is acceptable under Rule 3745-15-07 of the Administrative Code.

In order for the Director to determine compliance with all of the above criteria, the owner or operator of the portable or mobile source must file a "Notice of Intent to Relocate" at least 30 days prior to relocation of the source with the **NEDO**. Upon receipt of the notice, the Director, or the Director's authorized representative, will evaluate the request in accordance with the above criteria.

Failure to submit said notification and to receive Ohio Environmental Protection Agency approval prior to relocation of the source may result in fines and civil penalties.

ASHTA Chemicals, Inc. Facility ID: **0204010056**
PTI Application: 02-05971
Modification Issued: To be entered upon final issuance

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the sourc

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Type or insert electronic file here if applicable