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**
COLUMBIANA COUNTY
Application No: 02-20067
Fac ID: 0215020233
DATE: 8/10/2006

Von Roll America Inc
Allison Knowles
1250 St. George St.
East Liverpool, OH 43920

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 **$ 600** 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.

Sincerely,

Michael W. Ahern

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

CC: USEPA NEDO Eastgate Dev. & Trans. Study WV PA

COLUMBIANA COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-20067** FOR AN AIR CONTAMINANT SOURCE FOR
Von Roll America Inc

On 8/10/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Von Roll America Inc**, located at **1250 St. George St, East Liverpool**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-20067:

Chapter 31 modification to PTI 17-104 to change the usage of 3 storage tanks to processes and increase the allowable emission rates.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]

DRAFT MODIFICATION OF PERMIT TO INSTALL 02-20067

Application Number:	02-20067
Facility ID:	0215020233
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Von Roll America Inc
Person to Contact:	Allison Knowles
Address:	1250 St. George St. East Liverpool, OH 43920

Location of proposed air contaminant source(s) [emissions unit(s)]:
1250 St. George St
East Liverpool, **Ohio**

Description of proposed emissions unit(s):
Chapter 31 modification to PTI 17-104 to change the usage of 3 storage tanks to processes and increase the allowable 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

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the

permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the

permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

a. 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).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit 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.

11. 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.

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) 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. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 the requirements of this permit or cannot meet applicable standards.

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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 source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	45.3
Fugitive OC	101.1

Von Roll America Inc **Facility ID: 0215020233**
PTI Application: 02-20067
Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

The permittee shall comply with the requirements contained within the most recent version of the following regulations that are applicable to the facility:

a. 40 CFR 61, Subpart J = National Emissions Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene

b. 40 CFR 61, Subpart V = National Emission Standard for Equipment Leaks (Fugitive Emission Sources)

c. 40 CFR 61, Subpart FF = National Emission Standards for Benzene Waste Operations

d. 40 CFR 63, Subpart DD = National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	40 CFR 63, Subpart DD
P003 - Tanker transfer station (Bay 2) Tanker trucks unload liquid material that is piped to either the incinerator or to the tank farm. Blended material from tank farm may also be piped back to station for loading into tanker truck. Emissions generated from unloading and loading at the station are vented to the vapor recovery system.	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(E)(1) OAC rule 3745-21-07(G)(2) 40 CFR 61, Subpart FF	

Applicable Emissions Limitations/Control Measures	
Organic compound (OC) emissions shall not exceed 3.5 pounds per hour, 15.1tons per year. Fugitive OC emissions shall not exceed 33.7 tons per year. See sections A.I.2.a through A.I.2.l. The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3) The emissions limitation specified by this rule are less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3) The requirements specified by this subpart are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.l. The requirements	specified by this subpart are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.l.

2. Additional Terms and Conditions

2.a The doors of this emissions unit shall be closed when waste is being processed within this emissions unit.

2.b The vapor recovery system, or closed-vent system, shall be in operation with operational snorkels in place to capture 90 % of emissions when waste is being processed within this emissions unit. The snorkel is to be placed directly over the tanker vent in a manner in which the vent is inside the snorkel.

2.c The vapor recovery system shall route organic vapors to the incinerator, emissions unit N001, and/or to the carbon adsorption system. The incinerator and/or the carbon adsorption system shall be in operation when waste is being processed within this emissions unit.

2.d The vapor recovery system upstream from the ventilation header blower shall be operated at a pressure below atmospheric pressure so that there is adequate suction, or inward flow, at the snorkel.

2.e The incinerator, as a control device for this emissions unit, shall achieve a destruction efficiency of 99.99% for organic compounds.

2.f The carbon adsorption system shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

2.g The transfer system conveying the liquid waste to and from the tank farm and to the incinerator shall consist of continuous hard piping. All joints or seams between the pipe section shall be permanently or semi-permanently sealed (e.g., a welded joint between two sections of metal pipe or a bolted and gasketed flange). However, a flexible hose from the pump to the tanker is allowed.

2.h The vapor recovery system, or closed-vent system, shall comply with the following requirements:

i. Be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h).

ii. All gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

iii. One or more devices which vent directly to the atmosphere may be used on the closed-vent system provided each device remains in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the

closed-vent system resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.

2.i When a tanker truck is loaded, it shall be loaded only by the submerged fill method. The end of the submerged pipe, or point of liquid transfer, shall be within two fill pipe diameters of the bottom of the tanker truck. Any hatch or opening of the tanker truck shall also remain closed during loading, except for those opening(s) necessary for venting to prevent physical damage or deformation of the tanker truck.

2.j The permittee shall control equipment leaks from each equipment component of this emissions unit in accordance with sections 61.242 through 61.247 in 40 CFR Part 61, Subpart V - National Emission Standards for Equipment Leaks.

2.k Only one activity, loading or unloading, may be performed at any one time. Calculated emissions from loading activities are greater than those for unloading. The hourly emissions limit of 3.5 lbs OC/hour is based on the maximum potential emissions from the loading activity of a worse case fuel blend mixture, a loading loss value of 41.9 lbs/1,000 gallons, a maximum loading throughput of 44,000 gallons per 24 hours, and control by the carbon adsorption system with a 95% control efficiency.

2.l When this emissions unit is subject to the requirements of 40 CFR 61, Subpart FF (National Emissions Standards for Benzene Waste Operations), the permittee is exempt from Section 63.689 (standards for transfer system) of 40 CFR 63, Subpart DD. Because benzene may be present in the waste handled by this emissions unit at any given time, the requirements contained in both 40 CFR 61, Subpart FF and 40 CFR 63, Subpart DD serve as a basis for determining the Best Available Technology established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. Only one activity, loading or unloading, may be performed at any one time.

2. The permittee shall restrict certain waste streams from being processed and/or blended in this emissions unit in accordance with the State of Ohio Hazardous Waste Facility Installation and Operation Permit.

3. The maximum loading throughput of 44,000 gallons per day shall not be exceeded.

4. The physical properties of the waste stream handled by this emissions unit shall not cause the calculated loading loss value to be more than 41.9 pounds per 1,000 gallons.

5. The existing carbon within the carbon adsorption system shall be replaced with fresh carbon immediately when carbon breakthrough is indicated. Carbon breakthrough will be determined by the most current practice acceptable to the Ohio EPA.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day:

   a. the number of gallons loaded;

   b. the calculated loading loss value, in lbs/1,000 gallons, for the waste stream handled that day by this emissions unit during a day when loading activities occurred. If more than one type of waste stream was handled, the permittee shall use the one with the highest vapor pressure. The loading loss value shall be calculated by the following equation, taken from AP-42 Chapter 5.2 (1/95):

   $$L = 12.46 (S \times P \times M) / T$$

   where:

   L = Loading loss, in lbs/1,000 gallons

   S = Saturation factor, value found in Table 5.2-1 of AP-42, Chapter 5.2.

   P = True vapor pressure of material, in psia.

   M = Molecular weight of material, in lb/lb-mole. If the molecular weight of the fuel blend can not be determined, the permittee shall use the highest molecular weight from the current list of possible constituents that contribute to organic emissions.

   T = Temperature of material, in degree rankine.

2. The permittee shall monitor for detectable fugitive organic compound emissions over all covers, hatches, and ports of any tanker truck containing waste if the tanker truck remains on-site for over 24 hours. No detectable emissions would be indicated by an instrument reading of less than 500 ppmv above background.

3. The permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a device equipped with a continuous recorder to monitor the organic compound emissions from the exhaust vent stream from the carbon

adsorption system. This record shall be reviewed at least once per day.

4. The permittee shall maintain, and retain for the life of each control device, the following records:

   a. a statement signed and dated by the permittee certifying that the vapor recovery system and control device (incinerator and carbon absorption system) are designed to operate at the documented performance level when this emissions unit is operating at the highest load or capacity. The document will therefore include the following:

      i. a statement certifying that the vapor recovery system is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, is designed so that all gauging and sampling devices be gas-tight except when gauging or sampling is taking place, and that any rupture discs remain closed during normal operation.

      ii. a statement certifying that the incinerator can achieve a 99.99 % reduction efficiency for organic compounds when this emissions unit is operating at its highest load or capacity; and

      iii. a statement certifying that the carbon adsorption system can achieve a 95% control efficiency for organic compounds when this emissions unit is operating at its highest load or capacity.

   b. the design analysis showing control device performance. The design analysis shall include specifications, drawings, schematics, and piping and instrumentation diagrams prepared by the owner or operator, or the control device manufacturer or vendor that describe the control device design based on acceptable engineering texts.

      For the incinerator, the design analysis shall consider the vent stream composition, constituent concentrations, and flow rate. The design analysis shall also establish the design minimum and average temperature in the combustion zone and the combustion zone residence time.

      For the carbon adsorption system, the design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature. The design analysis shall also establish the design exhaust vent stream organic compound concentration level, capacity of carbon bed, type and

working capacity of activated carbon used for carbon bed, and design carbon replacement interval based on the total carbon working capacity of the control device and source operating schedule.

5. The permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a device equipped with a continuous recorder to monitor the pressure in the vapor recovery system upstream from the ventilation header blower. This record shall be reviewed at least once per day.

6. The permittee install, calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor the temperature in the combustion chamber of the incinerator, as a control device for this emissions unit. The temperature monitoring device shall have an accuracy of plus or minus 1 percent of the temperature being monitored in degree Celsius, or plus or minus 0.5 degree Celsius, whichever is greater. This record shall be reviewed according to the terms and conditions for emissions unit N001 under a separate permit.

7. The permittee shall perform quarterly, visual inspections of the vapor recovery system and control devices (incinerator and carbon adsorption system). The visual inspection shall include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections.

   If visible defects are observed during an inspection, or if other problems are identified, or if detectable emissions are measured, a first effort to repair the vapor recovery system and control device shall be made as soon as practicable but no later than 5 calendar days after detection. Repair shall be completed no later than 15 calendar days after the emissions are detected or the visible defect is observed. Exception for delay of repair would be allowed per 40 CFR 61.350.

8. The permittee shall maintain records that contain the following information:

   a. a record of any time when the vapor recovery system was not in operation when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action taken, if any;

   b. any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action taken, if any;

   c. any record indicating that the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action, if any;

d. any time when loading occurred without submerged fill. The record should include the date and an explanation;

e. any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit. This record may be included in the monthly Leak Detection and Repair Program report; and

f. any record indicating the loading and unloading activities occurred at the same time within this emissions unit. This record should include the date and an explanation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. each day when the number of gallons loaded exceeded 44,000 gallons;

   b. each day when the calculated loading loss value exceeded 41.9 pounds per 1,000 gallons;

   c. any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;

   e. any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;

   f. any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;

   g. each day when loading occurred without submerged fill;

   h. any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit; and

   i. any record indicating the loading and unloading activities occurred at the same time within this emissions unit.

The quarterly deviation reports shall be submitted in accordance with General Term and Conditions. The written reports shall be submitted quarterly to the Ohio EPA Northeast District Office, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

If no deviation occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

V. Testing Requirements

1. Emission Limitation:
   Organic compound emissions shall not exceed 3.5 pounds per hour.

   Applicable Compliance Method:
   Compliance shall be assumed when the maximum loading throughput is less than 44,000 gallons per day, the calculated loading loss of the material handled each day of operation is equal to or less than 41.9 lbs/1,000 gallons, and the carbon adsorption system is demonstrated to recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

2. Emission Limitation:
   Organic compound emissions shall not exceed 15.1 tons per year.

Applicable Compliance Method:
Compliance with the above emissions limitation is demonstrated when compliance with the hourly emissions rate is achieved.

3. Emission Limitation:
Fugitive organic compound emissions shall not exceed 33.7 tons per year.

Applicable Compliance Method:
Compliance shall be assumed when the maximum loading throughput is less than 44,000 gallons per day, the calculated loading loss of the material handled each day of operation is equal to or less than 41.9 lbs/1,000 gallons, and the carbon adsorption system is demonstrated to recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

4. Emission Limitation:
The incinerator, as a control device for this emissions unit, shall achieve a destruction efficiency of 99.99% for organic compounds.

Applicable Compliance Method:
The incinerator is already required to achieve a destruction efficiency of 99.99% for Principle Organic Hazardous Constituents (POHCs) under a separate permit for emissions unit N001. Comprehensive Performance Testing (CPT) established that the incinerator meets the required destruction efficiency of 99.99% for POHCs, which represents the more difficult organic compounds to destroy. To remain in compliance with this requirement, the incinerator must operate within the operating parameter limits established during the CPT, or most recent testing, as stated in the terms and conditions for emissions unit N001 under separate permit.

5. Emission Limitation:
The carbon adsorption system shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

Applicable Compliance Method:
Compliance shall be demonstrated by the monitoring and record keeping in Section III.4.

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit supercede those for this emissions unit established in PTI # 17-104 issued on February 2, 1983.

Von Roll America Inc
PTI A
Issue

Facility ID: 0215020233

Emissions Unit ID: P003

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P003 - Tanker transfer station (Bay 2) Tanker trucks unload liquid material that is piped to either the incinerator or to the tank farm. Blended material from tank farm may also be piped back to station for loading into tanker truck. Emissions generated from unloading and loading at the station are vented to the vapor recovery system.	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

N one

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	40 CFR 63, Subpart DD
P004 - Tanker transfer station (Bay 3) Tanker trucks unload liquid material that is piped to either the incinerator or to the tank farm. Blended material from tank farm may also be piped back to station for loading into tanker truck. Emissions generated from unloading and loading at the station are vented to the vapor recovery system.	OAC rule 3745-31-05(A)(3) OAC rule 3745-21-07(E)(1) OAC rule 3745-21-07(G)(2) 40 CFR 61, Subpart FF	

Applicable Emissions Limitations/Control Measures	
Organic compound (OC) emissions shall not exceed 3.5 pounds per hour, 15.1tons per year. Fugitive OC emissions shall not exceed 33.7 tons per year. See sections A.I.2.a through A.I.2.l. The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3) The emissions limitation specified by this rule are less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3) The requirements specified by this subpart are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.l. The requirements	specified by this subpart are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.l.

2. Additional Terms and Conditions

2.a The doors of this emissions unit shall be closed when waste is being processed within this emissions unit.

2.b The vapor recovery system, or closed-vent system, shall be in operation with operational snorkels in place to capture 90 % of emissions when waste is being processed within this emissions unit. The snorkel is to be placed directly over the tanker vent in a manner in which the vent is inside the snorkel.

2.c The vapor recovery system shall route organic vapors to the incinerator, emissions unit N001, and/or to the carbon adsorption system. The incinerator and/or the carbon adsorption system shall be in operation when waste is being processed within this emissions unit.

2.d The vapor recovery system upstream from the ventilation header blower shall be operated at a pressure below atmospheric pressure so that there is adequate suction, or inward flow, at the snorkel.

2.e The incinerator, as a control device for this emissions unit, shall achieve a destruction efficiency of 99.99% for organic compounds.

2.f The carbon adsorption system shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

2.g The transfer system conveying the liquid waste to and from the tank farm and to the incinerator shall consist of continuous hard piping. All joints or seams between the pipe section shall be permanently or semi-permanently sealed (e.g., a welded joint between two sections of metal pipe or a bolted and gasketed flange). However, a flexible hose from the pump to the tanker is allowed.

2.h The vapor recovery system, or closed-vent system, shall comply with the following requirements:

i. Be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h).

ii. All gauging and sampling devices shall be gas-tight except when gauging

or sampling is taking place.

iii. One or more devices which vent directly to the atmosphere may be used on the closed-vent system provided each device remains in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the closed-vent system resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.

2.i When a tanker truck is loaded, it shall be loaded only by the submerged fill method. The end of the submerged pipe, or point of liquid transfer, shall be within two fill pipe diameters of the bottom of the tanker truck. Any hatch or opening of the tanker truck shall also remain closed during loading, except for those opening(s) necessary for venting to prevent physical damage or deformation of the tanker truck.

2.j The permittee shall control equipment leaks from each equipment component of this emissions unit in accordance with sections 61.242 through 61.247 in 40 CFR Part 61, Subpart V - National Emission Standards for Equipment Leaks.

2.k Only one activity, loading or unloading, may be performed at any one time. Calculated emissions from loading activities are greater than those for unloading. The hourly emissions limit of 3.5 lbs OC/hour is based on the maximum potential emissions from the loading activity of a worse case fuel blend mixture, a loading loss value of 41.9 lbs/1,000 gallons, a maximum loading throughput of 44,000 gallons per 24 hours, and control by the carbon adsorption system with a 95% control efficiency.

2.l When this emissions unit is subject to the requirements of 40 CFR 61, Subpart FF (National Emissions Standards for Benzene Waste Operations), the permittee is exempt from Section 63.689 (standards for transfer system) of 40 CFR 63, Subpart DD. Because benzene may be present in the waste handled by this emissions unit at any given time, the requirements contained in both 40 CFR 61, Subpart FF and 40 CFR 63, Subpart DD serve as a basis for determining the Best Available Technology established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. Only one activity, loading or unloading, may be performed at any one time.

2. The permittee shall restrict certain waste streams from being processed and/or blended in this emissions unit in accordance with the State of Ohio Hazardous Waste Facility Installation and Operation Permit.

3. The maximum loading throughput of 44,000 gallons per day shall not be exceeded.

4. The physical properties of the waste stream handled by this emissions unit shall not cause the calculated loading loss value to be more than 41.9 pounds per 1,000 gallons.

5. The existing carbon within the carbon adsorption system shall be replaced with fresh carbon immediately when carbon breakthrough is indicated. Carbon breakthrough will be determined by the most current practice acceptable to the Ohio EPA.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day:

   a. the number of gallons loaded;

   b. the calculated loading loss value, in lbs/1,000 gallons, for the waste stream handled that day by this emissions unit during a day when loading activities occurred. If more than one type of waste stream was handled, the permittee shall use the one with the highest vapor pressure. The loading loss value shall be calculated by the following equation, taken from AP-42 Chapter 5.2 (1/95):

   $$L = 12.46 (S \times P \times M) / T$$

   where:

   L = Loading loss, in lbs/1,000 gallons

   S = Saturation factor, value found in Table 5.2-1 of AP-42, Chapter 5.2.

   P = True vapor pressure of material, in psia.

   M = Molecular weight of material, in lb/lb-mole. If the molecular weight of the fuel blend can not be determined, the permittee shall use the highest molecular weight from the current list of possible constituents that contribute to organic emissions.

   T = Temperature of material, in degree rankine.

2. The permittee shall monitor for detectable fugitive organic compound emissions over all covers, hatches, and ports of any tanker truck containing waste if the tanker truck remains on-site for over 24 hours. No detectable emissions would be indicated by an instrument reading of less than 500 ppmv above background.

3. The permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a device equipped with a continuous recorder to monitor the organic compound emissions from the exhaust vent stream from the carbon

adsorption system. This record shall be reviewed at least once per day.

4. The permittee shall maintain, and retain for the life of each control device, the following records:

   a. a statement signed and dated by the permittee certifying that the vapor recovery system and control device (incinerator and carbon absorption system) are designed to operate at the documented performance level when this emissions unit is operating at the highest load or capacity. The document will therefore include the following:

      i. a statement certifying that the vapor recovery system is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, is designed so that all gauging and sampling devices be gas-tight except when gauging or sampling is taking place, and that any rupture discs remain closed during normal operation.

      ii. a statement certifying that the incinerator can achieve a 99.99 % reduction efficiency for organic compounds when this emissions unit is operating at its highest load or capacity; and

      iii. a statement certifying that the carbon adsorption system can achieve a 95% control efficiency for organic compounds when this emissions unit is operating at its highest load or capacity.

   b. the design analysis showing control device performance. The design analysis shall include specifications, drawings, schematics, and piping and instrumentation diagrams prepared by the owner or operator, or the control device manufacturer or vendor that describe the control device design based on acceptable engineering texts.

      For the incinerator, the design analysis shall consider the vent stream composition, constituent concentrations, and flow rate. The design analysis shall also establish the design minimum and average temperature in the combustion zone and the combustion zone residence time.

      For the carbon adsorption system, the design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature. The design analysis shall also establish the design exhaust vent stream organic compound concentration level, capacity of carbon bed, type and working capacity of activated carbon used for carbon bed, and design carbon replacement interval based on the total carbon working capacity of the control device and source operating schedule.

5. The permittee shall install, calibrate, maintain, and operate according to the

manufacturer's specifications a device equipped with a continuous recorder to monitor the pressure in the vapor recovery system upstream from the ventilation header blower. This record shall be reviewed at least once per day.

6. The permittee install, calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor the temperature in the combustion chamber of the incinerator, as a control device for this emissions unit. The temperature monitoring device shall have an accuracy of plus or minus 1 percent of the temperature being monitored in degree Celsius, or plus or minus 0.5 degree Celsius, whichever is greater. This record shall be reviewed according to the terms and conditions for emissions unit N001 under a separate permit.

7. The permittee shall perform quarterly, visual inspections of the vapor recovery system and control devices (incinerator and carbon adsorption system). The visual inspection shall include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections.

   If visible defects are observed during an inspection, or if other problems are identified, or if detectable emissions are measured, a first effort to repair the vapor recovery system and control device shall be made as soon as practicable but no later than 5 calendar days after detection. Repair shall be completed no later than 15 calendar days after the emissions are detected or the visible defect is observed. Exception for delay of repair would be allowed per 40 CFR 61.350.

8. The permittee shall maintain records that contain the following information:

   a. a record of any time when the vapor recovery system was not in operation when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action taken, if any;

   b. any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action taken, if any;

   c. any record indicating that the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action, if any;

d. any time when loading occurred without submerged fill. The record should include the date and an explanation;

e. any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit. This record may be included in the monthly Leak Detection and Repair Program report; and

f. any record indicating the loading and unloading activities occurred at the same time within this emissions unit. This record should include the date and an explanation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. each day when the number of gallons loaded exceeded 44,000 gallons;

   b. each day when the calculated loading loss value exceeded 41.9 pounds per 1,000 gallons;

   c. any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;

   e. any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;

   f. any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;

   g. each day when loading occurred without submerged fill;

   h. any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit; and

   i. any record indicating the loading and unloading activities occurred at the same time within this emissions unit.

   The quarterly deviation reports shall be submitted in accordance with General Term and Conditions. The written reports shall be submitted quarterly to the Ohio EPA Northeast District Office, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

If no deviation occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

V. Testing Requirements

1. Emission Limitation:
   Organic compound emissions shall not exceed 3.5 pounds per hour.

   Applicable Compliance Method:
   Compliance shall be assumed when the maximum loading throughput is less than 44,000 gallons per day, the calculated loading loss of the material handled each day of operation is equal to or less than 41.9 lbs/1,000 gallons, and the carbon adsorption system is demonstrated to recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

2. Emission Limitation:
   Organic compound emissions shall not exceed 15.1 tons per year.

Applicable Compliance Method:
Compliance with the above emissions limitation is demonstrated when compliance with the hourly emissions rate is achieved.

3. Emission Limitation:
Fugitive organic compound emissions shall not exceed 33.7 tons per year.

Applicable Compliance Method:
Compliance shall be assumed when the maximum loading throughput is less than 44,000 gallons per day, the calculated loading loss of the material handled each day of operation is equal to or less than 41.9 lbs/1,000 gallons, and the carbon adsorption system is demonstrated to recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

4. Emission Limitation:
The incinerator, as a control device for this emissions unit, shall achieve a destruction efficiency of 99.99% for organic compounds.

Applicable Compliance Method:
The incinerator is already required to achieve a destruction efficiency of 99.99% for Principle Organic Hazardous Constituents (POHCs) under a separate permit for emissions unit N001. Comprehensive Performance Testing (CPT) established that the incinerator meets the required destruction efficiency of 99.99% for POHCs, which represents the more difficult organic compounds to destroy. To remain in compliance with this requirement, the incinerator must operate within the operating parameter limits established during the CPT, or most recent testing, as stated in the terms and conditions for emissions unit N001 under separate permit.

5. Emission Limitation:
The carbon adsorption system shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

Applicable Compliance Method:
Compliance shall be demonstrated by the monitoring and record keeping in Section III.4.

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit supercede those for this emissions unit established in PTI # 17-104 issued on February 2, 1983.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P004 - Tanker transfer station (Bay 3) Tanker trucks unload liquid material that is piped to either the incinerator or to the tank farm. Blended material from tank farm may also be piped back to station for loading into tanker truck. Emissions generated from unloading and loading at the station are vented to the vapor recovery system.	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	40 CFR 63, Subpart DD
P005 - Direct tanker transfer station East (Bay 1)	OAC rule 3745-31-05(A)(3)	
Tanker trucks unload liquid material that is piped to either the incinerator or to the tank farm. Blended material from tank farm may also be piped back to station for loading into tanker truck. Emissions generated from unloading and loading at the station are vented to the vapor recovery system.	OAC rule 3745-21-07(E)(1)	
	OAC rule 3745-21-07(G)(2)	
Waste containers not involving organics may also be split in this bay, from larger to smaller containers. Emissions are negligible.	40 CFR 61, Subpart FF	

Applicable Emissions Limitations/Control Measures	See section A.I.2.l.
Organic compound (OC) emissions shall not exceed 3.5 pounds per hour, 15.1tons per year. Fugitive OC emissions shall not exceed 33.7 tons per year. See sections A.I.2.a through A.I.2.l. The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3) The emissions limitation specified by this rule are less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3) The requirements specified by this subpart are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.l. The requirements specified by this subpart are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

2.a The doors of this emissions unit shall be closed when waste is being processed within this emissions unit.

2.b The vapor recovery system, or closed-vent system, shall be in operation with operational snorkels in place to capture 90 % of emissions when waste is being processed within this emissions unit. The snorkel is to be placed directly over the tanker vent in a manner in which the vent is inside the snorkel.

2.c The vapor recovery system shall route organic vapors to the incinerator, emissions unit N001, and/or to the carbon adsorption system. The incinerator and/or the carbon adsorption system shall be in operation when waste is being processed within this emissions unit.

2.d The vapor recovery system upstream from the ventilation header blower shall be operated at a pressure below atmospheric pressure so that there is adequate suction, or inward flow, at the snorkel.

2.e The incinerator, as a control device for this emissions unit, shall achieve a destruction efficiency of 99.99% for organic compounds.

2.f The carbon adsorption system shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

2.g The transfer system conveying the liquid waste to and from the tank farm and to the incinerator shall consist of continuous hard piping. All joints or seams between the pipe section shall be permanently or semi-permanently sealed (e.g., a welded joint between two sections of metal pipe or a bolted and gasketed flange). However, a flexible hose from the pump to the tanker is allowed.

2.h The vapor recovery system, or closed-vent system, shall comply with the following requirements:

i. Be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h).

ii. All gauging and sampling devices shall be gas-tight except when gauging

or sampling is taking place.

iii. One or more devices which vent directly to the atmosphere may be used on the closed-vent system provided each device remains in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the closed-vent system resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.

2.i When a tanker truck is loaded, it shall be loaded only by the submerged fill method. The end of the submerged pipe, or point of liquid transfer, shall be within two fill pipe diameters of the bottom of the tanker truck. Any hatch or opening of the tanker truck shall also remain closed during loading, except for those opening(s) necessary for venting to prevent physical damage or deformation of the tanker truck.

2.j The permittee shall control equipment leaks from each equipment component of this emissions unit in accordance with sections 61.242 through 61.247 in 40 CFR Part 61, Subpart V - National Emission Standards for Equipment Leaks.

2.k Only one activity, loading or unloading, may be performed at any one time. Calculated emissions from loading activities are greater than those for unloading. The hourly emissions limit of 3.5 lbs OC/hour is based on the maximum potential emissions from the loading activity of a worse case fuel blend mixture, a loading loss value of 41.9 lbs/1,000 gallons, a maximum loading throughput of 44,000 gallons per 24 hours, and control by the carbon adsorption system with a 95% control efficiency.

2.l When this emissions unit is subject to the requirements of 40 CFR 61, Subpart FF (National Emissions Standards for Benzene Waste Operations), the permittee is exempt from Section 63.689 (standards for transfer system) of 40 CFR 63, Subpart DD. Because benzene may be present in the waste handled by this emissions unit at any given time, the requirements contained in both 40 CFR 61, Subpart FF and 40 CFR 63, Subpart DD serve as a basis for determining the Best Available Technology established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. Only one activity, loading or unloading, may be performed at any one time.

Emissions Unit ID: P005

2. The permittee shall restrict certain waste streams from being processed and/or blended in this emissions unit in accordance with the State of Ohio Hazardous Waste Facility Installation and Operation Permit.

3. The maximum loading throughput of 44,000 gallons per day shall not be exceeded.

4. The physical properties of the waste stream handled by this emissions unit shall not cause the calculated loading loss value to be more than 41.9 pounds per 1,000 gallons.

5. The existing carbon within the carbon adsorption system shall be replaced with fresh carbon immediately when carbon breakthrough is indicated. Carbon breakthrough will be determined by the most current practice acceptable to the Ohio EPA.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day:

   a. the number of gallons loaded;

   b. the calculated loading loss value, in lbs/1,000 gallons, for the waste stream handled that day by this emissions unit during a day when loading activities occurred. If more than one type of waste stream was handled, the permittee shall use the one with the highest vapor pressure. The loading loss value shall be calculated by the following equation, taken from AP-42 Chapter 5.2 (1/95):

   $$L = 12.46 (S \times P \times M) / T$$

   where:

   L = Loading loss, in lbs/1,000 gallons

   S = Saturation factor, value found in Table 5.2-1 of AP-42, Chapter 5.2.

   P = True vapor pressure of material, in psia.

   M = Molecular weight of material, in lb/lb-mole. If the molecular weight of the fuel blend can not be determined, the permittee shall use the highest molecular weight from the current list of possible constituents that contribute to organic emissions.

   T = Temperature of material, in degree rankine.

2. The permittee shall monitor for detectable fugitive organic compound emissions over all covers, hatches, and ports of any tanker truck containing waste if the tanker truck remains on-site for over 24 hours. No detectable emissions would be indicated by an instrument reading of less than 500 ppmv above background.

3. The permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a device equipped with a continuous recorder to monitor the organic compound emissions from the exhaust vent stream from the carbon

adsorption system. This record shall be reviewed at least once per day.

4. The permittee shall maintain, and retain for the life of each control device, the following records:

   a. a statement signed and dated by the permittee certifying that the vapor recovery system and control device (incinerator and carbon absorption system) are designed to operate at the documented performance level when this emissions unit is operating at the highest load or capacity. The document will therefore include the following:

      i. a statement certifying that the vapor recovery system is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, is designed so that all gauging and sampling devices be gas-tight except when gauging or sampling is taking place, and that any rupture discs remain closed during normal operation.

      ii. a statement certifying that the incinerator can achieve a 99.99 % reduction efficiency for organic compounds when this emissions unit is operating at its highest load or capacity; and

      iii. a statement certifying that the carbon adsorption system can achieve a 95% control efficiency for organic compounds when this emissions unit is operating at its highest load or capacity.

   b. the design analysis showing control device performance. The design analysis shall include specifications, drawings, schematics, and piping and instrumentation diagrams prepared by the owner or operator, or the control device manufacturer or vendor that describe the control device design based on acceptable engineering texts.

      For the incinerator, the design analysis shall consider the vent stream composition, constituent concentrations, and flow rate. The design analysis shall also establish the design minimum and average temperature in the combustion zone and the combustion zone residence time.

      For the carbon adsorption system, the design analysis shall consider the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature. The design analysis shall also establish the design exhaust vent stream organic compound concentration level, capacity of carbon bed, type and

working capacity of activated carbon used for carbon bed, and design carbon replacement interval based on the total carbon working capacity of the control device and source operating schedule.

5. The permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a device equipped with a continuous recorder to monitor the pressure in the vapor recovery system upstream from the ventilation header blower. This record shall be reviewed at least once per day.

6. The permittee install, calibrate, maintain, and operate according to the manufacturer's specifications a device to continuously monitor the temperature in the combustion chamber of the incinerator, as a control device for this emissions unit. The temperature monitoring device shall have an accuracy of plus or minus 1 percent of the temperature being monitored in degree Celsius, or plus or minus 0.5 degree Celsius, whichever is greater. This record shall be reviewed according to the terms and conditions for emissions unit N001 under a separate permit.

7. The permittee shall perform quarterly, visual inspections of the vapor recovery system and control devices (incinerator and carbon adsorption system). The visual inspection shall include inspection of ductwork and piping and connections to covers and control devices for evidence of visible defects such as holes in ductwork or piping and loose connections.

   If visible defects are observed during an inspection, or if other problems are identified, or if detectable emissions are measured, a first effort to repair the vapor recovery system and control device shall be made as soon as practicable but no later than 5 calendar days after detection. Repair shall be completed no later than 15 calendar days after the emissions are detected or the visible defect is observed. Exception for delay of repair would be allowed per 40 CFR 61.350.

8. The permittee shall maintain records that contain the following information:

   a. a record of any time when the vapor recovery system was not in operation when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action taken, if any;

   b. any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action taken, if any;

   c. any record indicating that the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit. The record should include the date and duration, in minutes, explanation, and corrective action, if any;

d. any time when loading occurred without submerged fill. The record should include the date and an explanation;

e. any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit. This record may be included in the monthly Leak Detection and Repair Program report; and

f. any record indicating the loading and unloading activities occurred at the same time within this emissions unit. This record should include the date and an explanation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:

   a. each day when the number of gallons loaded exceeded 44,000 gallons;

   b. each day when the calculated loading loss value exceeded 41.9 pounds per 1,000 gallons;

   c. any time when the vapor recovery system was not in operation when waste was processed within this emissions unit;

   e. any time when emissions in the vapor recovery system were not vented to either the incinerator and/or the carbon adsorption system when waste was processed within this emissions unit;

   f. any record indicating the pressure within the vapor recovery system upstream from the ventilation header blower was at or above atmospheric pressure when waste was processed within this emissions unit;

   g. each day when loading occurred without submerged fill;

   h. any record indicating detectable emissions from the vapor recovery system or from any equipment component of this emissions unit; and

   i. any record indicating the loading and unloading activities occurred at the same time within this emissions unit.

   The quarterly deviation reports shall be submitted in accordance with General Term and Conditions. The written reports shall be submitted quarterly to the Ohio EPA Northeast District Office, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

If no deviation occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during the quarter.

V. Testing Requirements

1. Emission Limitation:
   Organic compound emissions shall not exceed 3.5 pounds per hour.

   Applicable Compliance Method:
   Compliance shall be assumed when the maximum loading throughput is less than 44,000 gallons per day, the calculated loading loss of the material handled each day of operation is equal to or less than 41.9 lbs/1,000 gallons, and the carbon adsorption system is demonstrated to recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

2. Emission Limitation:
   Organic compound emissions shall not exceed 15.1 tons per year.

Applicable Compliance Method:
Compliance with the above emissions limitation is demonstrated when compliance with the hourly emissions rate is achieved.

3. Emission Limitation:
Fugitive organic compound emissions shall not exceed 33.7 tons per year.

Applicable Compliance Method:
Compliance shall be assumed when the maximum loading throughput is less than 44,000 gallons per day, the calculated loading loss of the material handled each day of operation is equal to or less than 41.9 lbs/1,000 gallons, and the carbon adsorption system is demonstrated to recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

4. Emission Limitation:
The incinerator, as a control device for this emissions unit, shall achieve a destruction efficiency of 99.99% for organic compounds.

Applicable Compliance Method:
The incinerator is already required to achieve a destruction efficiency of 99.99% for Principle Organic Hazardous Constituents (POHCs) under a separate permit for emissions unit N001. Comprehensive Performance Testing (CPT) established that the incinerator meets the required destruction efficiency of 99.99% for POHCs, which represents the more difficult organic compounds to destroy. To remain in compliance with this requirement, the incinerator must operate within the operating parameter limits established during the CPT, or most recent testing, as stated in the terms and conditions for emissions unit N001 under separate permit.

5. Emission Limitation:
The carbon adsorption system shall recover or control the organic emissions vented to it with an efficiency of 95 weight percent or greater.

Applicable Compliance Method:
Compliance shall be demonstrated by the monitoring and record keeping in Section III.4.

VI. Miscellaneous Requirements

1. The terms and conditions contained in this permit supercede those for this emissions unit established in PTI # 17-104 issued on February 2, 1983.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P005 - Direct tanker transfer station East (Bay 1) Tanker trucks unload liquid material that is piped to either the incinerator or to the tank farm. Blended material from tank farm may also be piped back to station for loading into tanker truck. Emissions generated from unloading and loading at the station are vented to the vapor recovery system. Waste containers not involving organics may also be split in this bay, from larger to smaller containers. Emissions are negligible.	None	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None