**OhioEPA**
State of Ohio Environmental Protection Agency

STREET ADDRESS:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

Re: Permit to Install
Lawrence County
Application No: 07-426
SYNTHETIC MINOR

CERTIFIED MAIL

RECEIVED
OCT 25 1996
PORTSMOUTH LOCAL AIR AGENCY

October 23, 1996

ASHLAND CHEMICAL - SOUTH POINT
TARA LANIER
5200 BLAZER PARKWAY
COLUMBUS, OH 43216

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Board of Review pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
PORTSMOUTH AIR POLLUTION GROUP



George V. Voinovich, Governor
Nancy P. Hollister, Lt. Governor
Donald R. Schregardus, Director

State of Ohio Environmental Protection Agency

# Permit to Install
# Terms and Conditions

Application No. 07-426
APS Premise No. 0744000107
Permit Fee: $2500.00

Name of Facility: ASHLAND CHEMICAL - SOUTH POINT

Person to Contact: TARA LANIER

Address: 5200 BLAZER PARKWAY
COLUMBUS, OH 43216

Location of proposed source(s): US 52 1.4 MILES NORTH OF SOLIDA ROAD
SOUTH POINT, OHIO

Description of proposed source(s):
BARGE LOADING & MODIFICATION TO 2 1015000 GALLON FIXED ROOF PETROLEUM DISTILLATE TANKS TO INCREASE ALLOWABLE EMISSIONS.

Date of Issuance: October 23, 1996

Effective Date: October 23, 1996

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the 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 and specifications, the above described source(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Donald R Schregardus

Director

**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 prove to be inadequate or 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**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

**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, regulations, and policies.

**AIR EMISSION SUMMARY**

The air contaminant sources listed below comprise the Permit to Install for ASHLAND CHEMICAL - SOUTH POINT located in Lawrence County. The sources 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 | Applicable Federal & OAC Rules | Permit Allowable Mass Emissions and/or Control/Usage Requirements |
|---|---|---|---|---|
| T001 | 1,015,000 gallon fixed roof storage tank for petroleum distillates | Submerged fill. Maximum vapor pressure of material stored shall not exceed 0.10 psia. | 3745-31-05<br>3745-21-09 (L) | 2.50 TPY VOC |
| T002 | 1,015,000 gallon fixed roof storage tank for petroleum distillates | Submerged fill. Maximum vapor pressure of material stored shall not exceed 0.10 psia. | 3745-31-05<br>3745-21-09 (L) | 2.50 TPY VOC |
| J001 | Barge loading | Loading/ unloading rate not to exceed 300,000 gallons per day and 10,000,000 gallons per 365 day rolling average. | 3745-31-05 | 61.36 lbs/hr VOC<br>2.56 TPY VOC |

**SUMMARY**
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

| Pollutant | Tons/Year |
|---|---|
| VOC | 7.56 |

**CONSTRUCTION STATUS**

The Portsmouth Air Pollution Group shall be notified in writing as to (a) the construction starting date, (b) the construction completion date, and (c) the date the facilities were placed into operation for the following sources: T001, T002, and J001.

**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 Portsmouth Air Pollution Group, 728 Second Street, Portsmouth, Ohio 45662.

**WASTE DISPOSAL**

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 Portsmouth Air Pollution Group, 728 Second Street, Portsmouth, Ohio 45662.

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.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

1. The permittee shall not place, store, or hold in these fixed roof tanks any petroleum liquid which, as stored, has a true vapor pressure greater than 0.10 pound per square inch absolute.

2. The permittee shall maintain records of the following information:

   A. the types of petroleum liquids stored in the tank;

   B. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid; and

   C. the maximum daily throughput for T001, T002 and J001.

3. The permittee shall submit annual reports which identify any exceedances of the above mentioned limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

4. The maximum daily throughput for T001, T002, and J001 shall not exceed 300,000 gallons and the maximum annual throughput shall not exceed 10 million gallons, based upon a rolling, 365-day summation.

5. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the throughput rates specified in the following table:

| Month | Maximum Allowable Cumulative Throughput |
|---|---|
| 1 | 833,333 gallons |
| 1-2 | 1,666,667 gallons |
| 1-3 | 2,500,000 gallons |
| 1-4 | 3,333,333 gallons |
| 1-5 | 4,166,667 gallons |
| 1-6 | 4,500,000 gallons |
| 1-7 | 5,833,333 gallons |
| 1-8 | 6,666,667 gallons |
| 1-9 | 7,500,000 gallons |
| 1-10 | 8,333,333 gallons |
| 1-11 | 9,166,667 gallons |
| 1-12 | 10,000,000 gallons |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual throughput rate limitation shall be based upon a rolling, 365-day summation of the throughput rates.

6. The permittee shall maintain daily records of the following information:

   A. the material throughput rate for each day; and

   B. beginning after the first 12 calendar months of operation, following the issuance of this permit, the rolling, 365 day summation of the material throughput rate.

   Also, during the first 12 calendar months of operation, following the issuance of this permit, the permittee shall record the cumulative material throughput rate for each calendar month.

7. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365 day material throughput rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative material throughput levels.