



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

Certified Mail

8/9/2012

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Amy Timmons  
Univar USA, Inc.  
30450 Tracy Road  
Walbridge, OH 43465

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0448011150  
Permit Number: P0110388  
Permit Type: Initial Installation  
County: Lucas

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
TDES; Michigan; Indiana; Canada





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Univar USA, Inc. (Univar) is a facility located in Toledo, Ohio (Lucas County) that is an industrial chemical distributor of a variety of chemicals used by numerous industries in the United States and other countries. The facility receives a variety of chemicals from various manufacturers that are brought by rail car or tanker truck and are stored in above ground storage tanks (ASTs) for future transfer into tanker trucks or containers (intermediate bulk containers (IBCs), drums, or pails) or transferred directly from rail cars to tanker trucks.

Univar has applied for an air permit for: (1) two existing filling stations for IBCs, drums, and pails; and (2) two existing tanker truck loading/unloading areas. The application also includes a de minimis request for the valve, flange, and seal fugitives from organic liquid transfer operations, paved and unpaved roadways and parking areas, and a notice that all ASTs are exempt under OAC rule 3745-31-03(A)(1)(I)(iv).

3. Facility Emissions and Attainment Status:

Facility-wide actual OC and HAPs emissions are less than 10 lb/d OC and less than 1 tpy HAPs.

Facility-wide individual HAPs are restricted to 9.9 tons per year and facility-wide combined HAPs emissions are restricted to 24.9 tons per year. These federally enforceable restrictions allow Univar to remain a minor source for PSD and Title V purposes and remove the permittee from applicability of 40 CFR 63, Subpart EEEE – National Emissions Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline).

Lucas County is classified as attainment for all criteria pollutants.

4. Source Emissions:

Permit allowable OC emissions for J001 and P001 will be 1.83 tons OC each.

5. Conclusion:

This permit is non-controversial and should be issued draft-final for federal enforceability.

6. Please provide additional notes or comments as necessary:

### **Project Background:**

This FEPTIO is for two existing emissions units, without controls, installed in October, 1962: (1) two filling stations for IBCs, drums, and pails; and (2) two tanker truck loading/unloading areas. Univar handles a wide variety of chemicals that are brought into the facility via rail car or tanker truck and are either stored in ASTs for future transfer into tanker trucks or containers or are transferred directly from



rail cars into tanker trucks. In 1997 the Toledo Division of Environmental Services determined these two sources, along with a spray booth, were de minimis under OAC rule 3745-15-05(D).

In the application, the facility demonstrated that the potential to emit is less than 1.0 tpy HAPs. The application requests a transition from de minimis to federally enforceable restrictions on OCs and HAPs.

Based on Ohio EPA's interpretation that the de minimis rule (OAC rule 3745-15-05(D)) is federally enforceable as part of the SIP, this facility is considered to have federally enforceable restrictions on HAPs emissions prior to the compliance date of the MACT (40 CFR 63, Subpart EEEE) and this rule is not applicable to the facility.

BAT does not apply because of the installation date and air toxics modeling is not required. Therefore, this application is to volunteer restrictions on OCs and HAPs to avoid air toxics modeling and major source status (OAC rule 3745-31-05(D)). There have not been any physical modifications to these emissions units.

The permit will be written with federally enforceable restrictions of 1.83 tons OC (per emissions unit), 9.9 tons (individual) HAPs (facility-wide), and 24.9 tons (combined) HAPs (facility-wide) as a rolling, 12-month summation to retain federally enforceable restrictions below major source thresholds. Compliance will be demonstrated by monthly recordkeeping and reporting requirements.

The federally enforceable OC and HAP emissions on J001 and P001 will effectively restrict emissions from the valve, flange, and seal fugitives from organic liquid transfer operations and each of the tanks at the facility to 1.83 tons OC and 1.0 ton HAPs as a practical purpose. Therefore, permits will not be issued for these emissions units and de minimis recordkeeping will be required per a de minimis letter.

**Exemptions and de minimis status:**

The permit application also indicates:

The ASTs are exempt under OAC rule 3745-31-03(A)(1)(I)(iv) because all the ASTs (at the time of this permit application, 35 tanks with 60 compartments) contain organic liquids, have a capacity of 19,815 gallons or less, and are equipped with submerged fill pipes.

The valve, flange, and seal fugitives from organic liquid transfer operations, paved/unpaved roadways, and parking areas are de minimis under OAC rule 3745-15-05(B) because the potential to emit any regulated air pollutant is less than 10 pounds per day.

**BAT Determination:**

Univar indicates these emissions units were installed in October, 1962. Because this was prior to any effective rules for BAT, a BAT determination at the time of installation will not be made. BAT rules do not apply to these two emissions units.

**Air Toxics:**

Air toxics modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" is not triggered because the sources are not subject to BAT.



**State Air Dispersion Modeling:**

State air dispersion modeling is not required because in minor source state permits, air dispersion modeling exempts non-process fugitive sources such as material storage and material transfer operations.

**Applicable Rules and Regulations:**

OAC rule 3745-31-05(A)(3) N/A – emissions units installed in 1962 and have not been modified

OAC rule 3745-31-05(D) Volunteered OC limits and HAPs limits to avoid major source status

OAC rule 3745-21-07 There are no applicable requirements under this rule

Air Toxics Policy Per ORC 3704.03(F)(4)(f)(i), the air toxics policy does not apply to storage tanks and transfer operations, so it does not apply to this permit

40 CFR 63, Subpart EEEE Exempt – this was not an existing affected source because it was not a major source prior to the effective date of this rule (de minimis determination January 14, 1997)

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	3.66
HAPs (individual) (facility-wide)	9.9
HAPs (combined) (facility-wide)	24.9



PUBLIC NOTICE

8/9/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Univar USA, Inc.

4051 South Ave.,

Toledo, OH 43615

Lucas County

FACILITY DESC.: Other Chemical and Allied Products Merchant Wholesalers

PERMIT #: P0110388

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation permit for load rack and bulkloading to avoid Title V status

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Mary Lehman-Schmidt, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Univar USA, Inc.**

Facility ID:	0448011150
Permit Number:	P0110388
Permit Type:	Initial Installation
Issued:	8/9/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
Univar USA, Inc.

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## Authorization

Facility ID: 0448011150

Application Number(s): A0045014

Permit Number: P0110388

Permit Description: Initial installation permit for load rack and bulkloading to avoid Title V status

Permit Type: Initial Installation

Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 8/9/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Univar USA, Inc.  
4051 South Ave.  
Toledo, OH 43615

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

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

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0110388

Permit Description: Initial installation permit for load rack and bulkloading to avoid Title V status

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

**Group Name: truck and bulk loading**

<b>Emissions Unit ID:</b>	<b>J001</b>
Company Equipment ID:	J001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	P001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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

Univar USA, Inc.

**Permit Number:** P0110388

**Facility ID:** 0448011150

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

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

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

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

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

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

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

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

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

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

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

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

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

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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

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

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

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

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

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

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) B.2. and B.3.
2. The combined facility-wide emissions of hazardous air pollutants (HAPs) from all emission units at this facility shall not exceed 9.9 tons individual HAP and 24.9 tons of any combination of HAPs, based upon a rolling, 12-month summation of the monthly emissions.
  - a) The permittee shall collect and record the following information for each month for all emissions units at this facility:
    - (1) the individual HAP content for each product stored or transferred;
    - (2) the volume throughput of each HAP-containing liquid organic material stored or transferred, in gallons;
    - (3) the molecular weight of each HAP-containing liquid organic material stored or transferred;
    - (4) the vapor pressure of each HAP-containing liquid organic material stored or transferred, in pounds per square inch absolute;
    - (5) the storage temperature, in degrees Rankine;
    - (6) the individual HAP emissions, in tons;
    - (7) the combined facility-wide rolling, 12-month summation of the individual HAP emissions, calculated by adding the current month's individual HAP emissions to the individual HAP emissions for the preceding eleven calendar months, in tons per year;
    - (8) the combined facility-wide rolling, 12-month summation of the combined HAPs emissions for all liquid organic materials stored or transferred, calculated by adding the current month's combined HAPs emissions from all liquid organic materials transferred at this facility to the combined HAPs emissions for the preceding eleven calendar months, in tons per year, i.e., the 12-month summation of B.2.a)(7).
3. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

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

Univar USA, Inc.

**Permit Number:** P0110388

**Facility ID:** 0448011150

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

- a) an identification of each month during which the combined facility-wide emissions of any individual HAP exceeded 9.9 tons per rolling 12-month period, and the actual 12-month summation of any such HAP emissions for each such month;
- b) an identification of each month during which the combined facility-wide emissions of combined HAPs exceeded 24.9 tons per rolling, 12-month period, and the actual 12-month summation of any such HAP emissions for each such month; and

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

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

1. Emissions Unit Group -truck and bulk loading: J001,P001,

EU ID	Operations, Property and/or Equipment Description
J001	Transport Loading. Pumps, piping, and hose for transfer of liquids into tanker trucks. Rail unloading area also includes elevated platforms.
P001	Container Filling. Pumps, piping, hose, and mechanical equipment to fill 55-gallon drums, intermediate bulk containers, and 5-gallon containers.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(2)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. B.2, B.3, b)(1)a., b)(2)b, c)(1), d)(1)g and e)(1)

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)  Federally enforceable restrictions to avoid 40 CFR 63 Subpart EEEE and major source status	emissions of organic compounds (OC) shall not exceed 1.83 tons as a rolling, 12-month summation for this emissions unit  facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 9.9 tons individual, or 24.9 tons of any combination of HAPs as a rolling, 12-month summation  see b)(2)a., b)(2)b., and c)(1)
b.	OAC rule 3745-21-07(M)	See b)(2)c.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the OC emissions from this air contaminant source since the calculated annual emission rate for OC is less than 10 tons per year taking into account the federally enforceable limit of 1.83 tons per year of OC as a rolling, 12-month summation of the monthly emissions as established under OAC rule 3745-31-05(D). VOC emissions are assumed to be equal to the OC emissions.
- b. The annual facility-wide HAP emission limitations have additional recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions to ensure compliance with these limitations.
- c. There are no applicable requirements for loading racks at this facility in OAC rule 3745-21-07(M).

c) Operational Restrictions

- (1) The maximum throughput for this emissions unit shall be limited by the following formula, calculated as a rolling, 12-month period:

$$1.83 \text{ tons OC} \geq \sum_{i=1}^n (LL_i)(V_i)$$

Where:

$LL_i$  = loading loss for material  $i$  transferred in pounds per thousand gallons, as calculated according to f)(1)a.

$V_i$  = Volume of material  $i$  transferred in gallons per rolling, 12-month period

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the production rate, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each month for compliance with the 1.83 tons per year OC limit from this emissions unit:
- a. the name and identification of each material transferred;
  - b. the number of gallons of each material transferred;
  - c. the molecular weight of each material transferred;
  - d. the vapor pressure of each material transferred, in pounds per square inch absolute;

- e. the storage temperature of each material transferred, in degrees Rankine;
  - f. the OC emissions for all materials transferred, in tons per month calculated according to f)(1)a.;
  - g. the total OC emissions as a rolling, 12-month summation of the monthly emissions, calculated according to f)(1)a.
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit to install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. an identification of each month during which the OC emissions exceeded 1.83 tons as a rolling, 12-month summation of the monthly emissions, and the actual 12-month summation of any such OC emissions for each such month;
  - b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - c. the magnitude and duration of each deviation (excursion).
- If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.
- The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit.

The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission limitation:

1.83 tons OC as a rolling, 12-month summation of the monthly emissions from this emissions unit.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of d)(1) of this permit and the following calculation.

Calculate the monthly loading losses for each material transferred ( $LL_i$ ) using the Equation 1 of AP-42 Section 5.2 dated 6/08.

$$\text{Loading losses of material } i = LL_i = (\text{lbs OC}/1000 \text{ gallons}) = (12.46 * S_i * P_i * M_i) / T_i$$

Where:

$S_i$  = Saturation factor for material  $i$  (0.5 for submerged pipe filling for truck loading and 1.45 for splash filling for container filling)

$P_i$  = Vapor pressure of material  $i$  at  $T_i$ , in pounds per square inch absolute

$M_i$  = Molecular weight of material  $i$

$T_i$  = Temperature of material  $i$ , degrees Rankine

Calculate the monthly OC emissions for each material transferred using the following equation.

$$OC = \sum_{i=1}^n (LL_i)(V_i)$$

Where:

OC = OC emissions, (tons)

$LL_i$  = Loading loss of material  $i$ , (lbs OC/1,000 gallons transferred)

$V_i$  = gallons of material i transferred as recorded in d)(1)

n = total number of materials transferred

Add the current month's OC emissions from all liquid organic materials transferred at this facility to the OC emissions for the preceding eleven calendar months to determine the tons of OC emissions as a rolling, 12-month summation of the monthly emissions.

b. Emission limitation:

9.9 tons per year individual HAP facility-wide as a rolling, 12-month summation of the monthly emissions.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

c. Emission limitation:

24.9 tons per year combined HAPs facility-wide as a rolling, 12-month summation of the monthly emissions.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

g) Miscellaneous Requirements

(1) None.