



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
FRANKLIN COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 01-7895

DATE: July 14, 1999

Georgia-Pacific Resins
Andy Norman
1975 Watkins Road
Columbus, OH 43207

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 Review Appeals Commission 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 within thirty (30) days after the notice of the Directors 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 Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:



Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA
DAPC, CDO

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 07/14/1999

DIRECT FINAL PERMIT TO INSTALL 01-7895

Application Number: 01-7895
APS Premise Number: 0125040904
Permit Fee: **\$300**
Name of Facility: Georgia-Pacific Resins
Person to Contact: Andy Norman
Address: 1975 Watkins Road
Columbus, OH 43207

Location of proposed air contaminant source(s) [emissions unit(s)]:
1975 Watkins Road
Columbus, Ohio

Description of proposed emissions unit(s):
TWO 21,000 GALLON PORTABLE STORAGE TANKS; TEMPORARY METHANOL STORAGE DURING TANK INSPECTION.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 emissions unit(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 emissions unit(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



Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install 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.

9. Construction of New Sources(s)

The proposed emissions unit(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 emissions unit(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 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.

10. 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.

11. 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).

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of

Georgia-Pacific Resins
 PTI Application: **01-7895**
July 14, 1999

Facility ID: **0125040904**

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. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. 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 this Permit to Install.

B. 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	0.026

PART II: SPECIAL TERMS AND CONDITIONS

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
21,000 gallon methanol storage vessel (temporary use during inspection of T85 storage tank)	OAC rule 3745-31-05	See A.2.a. and A.2.b. below.
	40 CFR Part 60 Subpart Kb	See C.1. and D.1. below.
	OAC rule 3745-21-09(L)	None, exempt pursuant to 3745-21-09(L)(2).

2. Additional Terms and Conditions

- 2.a. The combined emissions from storage vessels from T063 and T064 shall not exceed 0.026 ton OC/yr.
- 2.b. The permittee shall employ submerged fill and vapor balance to the delivery tanker during methanol offloading.

B. Operational Restrictions

- 1. This emissions unit shall only be used for the period of time during which the 400,000 gallon methanol storage tank T-85 is being taken out of service, is out of service, or being brought back into service for the purpose of being inspected and/or having maintenance performed on it.

After the inspection and/or maintenance on the 400,000 gallon methanol storage tank T-85 is completed, this emissions unit will be taken out of service and removed from the facility.

- 2. The annual combined throughput of T063 and T064 shall be restricted to 2,000,000 gallons of methanol.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain and keep readily accessible a record showing the dimension of the storage vessel and analysis showing the capacity of the storage vessel for the life of the emissions unit.
2. The permittee shall, for the purposes of determining annual emissions, record on a daily basis the cumulative number of gallons of methanol transferred to the storage vessels.

D. Reporting Requirements

1. If the permittee stores in this storage vessel any liquid with a maximum true vapor pressure which is greater than 4.0 pounds per square inch absolute, the permittee shall notify the Director (the Ohio EPA Central District Office) within 30 days of the exceedence.
2. The permittee shall notify the Director (the Central District Office) in writing if the total throughput of the two storage vessels exceed 2,000,000 gallons. The notification shall include a copy of such record(s) showing the amount of exceedence and shall be sent to the Director within 30 days of the exceedence.

E. Testing Requirements

Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

0.026 ton OC/yr, combined emissions for T063 and T064.

Applicable Compliance Method:

USEPA Tanks Program calculated uncontrolled working and standing loss emissions of 2,402 lbs based on maximum annual methanol feed rate to the number 2 formaldehyde plant of 11,045,520 gallons per year.

$2,402 \text{ lb methanol} / (11,045,520 \text{ gallons} / 1,000 \text{ gallons}) = 0.217 \text{ lb methanol} / 1,000 \text{ gallons throughput}$

$42,000 \text{ gallons (pumped from T85)} * 0.22 \text{ lb methanol} / 1,000 \text{ gallons} * 1 \text{ ton} / 2,000 \text{ lb} = 9.24 \text{ lbs OC}$

(2,000,000- 42,000 gallons) gallons w/vapor balance* 0.22 lb/1,000 gallon * (1-0.9 control) = 43 lbs OC

$9.24 \text{ lbs} + 43 \text{ lbs} = 52.24 \text{ lbs/yr} * 1 \text{ ton}/2,000 \text{ lbs} = 0.026 \text{ ton OC/yr}$

The control efficiency factor of 90% for the vapor balance was used as worst case per the AP-42 range of 90 - 99% as referenced in the Fourth Edition, 9/85, pg. 4.4-7.

F. Miscellaneous Requirements

1. The Ohio EPA, US EPA and Georgia-Pacific Resins are currently involved in determining whether this facility is subject to the HON rules. Until this determination is made, Georgia-Pacific Resins agrees to comply with the applicable record keeping and leak detection monitoring requirements of the HON rules per 40 CFR Part 63, Subparts G and H for this emissions unit.

PART II: SPECIAL TERMS AND CONDITIONS [Continued]

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
21,000 gallon methanol storage vessel (temporary use during inspection of T85 storage tank)	OAC rule 3745-31-05	See A.2.a. and A.2.b. below.
	40 CFR Part 60 Subpart Kb	See C.1. and D.1. below.
	OAC rule 3745-21-09(L)	None, exempt pursuant to 3745-21-09(L)(2).

2. **Additional Terms and Conditions**

- 2.a. The combined emissions from storage vessels from T063 and T064 shall not exceed 0.026 ton OC/yr.
- 2.b. The permittee shall employ submerged fill and vapor balance to the delivery tanker during methanol offloading.

B. Operational Restrictions

1. This emissions unit shall only be used for the period of time during which the 400,000 gallon methanol storage tank T-85 is being taken out of service, is out of service, or being brought back into service for the purpose of being inspected and/or having maintenance performed on it.

 After the inspection and/or maintenance on the 400,000 gallon methanol storage tank T-85 is completed, this emissions unit will be taken out of service and removed from the facility.
2. The annual combined throughput of T063 and T064 shall be restricted to 2,000,000 gallons of methanol.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain and keep readily accessible a record showing the dimension of the storage vessel and analysis showing the capacity of the storage vessel for the life of the emissions unit.
2. The permittee shall, for the purposes of determining annual emissions, record on a daily basis the cumulative number of gallons of methanol transferred to the storage vessels.

D. Reporting Requirements

1. If the permittee stores in this storage vessel any liquid with a maximum true vapor pressure which is greater than 4.0 pounds per square inch absolute, the permittee shall notify the Director (the Ohio EPA Central District Office) within 30 days of becoming aware of the exceedence.
2. The permittee shall notify the Director (the Central District Office) in writing, if the total throughput of the two storage vessels exceed 2,000,000 gallons. The notification shall include a copy of such record(s) showing the amount of exceedence and shall be sent to the Director within 30 days of the exceedence.

E. Testing Requirements

Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

0.026 ton OC/yr, combined emissions for T063 and T064.

Applicable Compliance Method:

USEPA Tanks Program calculated uncontrolled working and standing loss emissions of 2,402 lbs based on maximum annual methanol feed rate to the number 2 formaldehyde plant of 11,045,520 gallons per year.

$2,402 \text{ lb methanol} / (11,045,520 \text{ gallons} / 1,000 \text{ gallons}) = 0.217 \text{ lb methanol} / 1,000 \text{ gallons throughput}$

42,000 gallons (pumped from T85) * 0.22 lb methanol/1,000 gallons * 1 ton/2,000 lb = 9.24 lbs
OC

(2,000,000- 42,000 gallons) gallons w/vapor balance * 0.22 lb/1,000 gallon * (1-0.9 control) = 43
lb OC

9.24 lbs + 43 lbs = 52.24 lbs/yr * 1 ton/2,000 lbs = 0.026 ton OC/yr

The control efficiency factor of 90% for the vapor balance was used as worst case per the AP-42 range of 90 - 99% as referenced in the Fourth Edition, 9/85, pg. 4.4-7.

F. Miscellaneous Requirements

The Ohio EPA, US EPA and Geogia-Pacific Resins are currently involved in determining whether this facility is subject to the HON rules. Until this determination is made, Georgia-Pacific Resins agrees to comply with the applicable record keeping and leak detection monitoring requirements of the HON rules per 40 CFR Part 63, Subparts G and H for this emissions unit.