



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

RE: **FINAL PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL  
LUCAS COUNTY  
Application No: 04-01123

DATE: 1/27/2004

Perstorp Polyols Inc  
Anthony Sloma  
600 Matzinger Rd  
Toledo, OH 43612

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

TDES



**Permit To Install  
Terms and Conditions**

**Issue Date: 1/27/2004  
Effective Date: 1/27/2004**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 04-01123

Application Number: **04-01123**  
APS Premise Number: **0448010133**  
Permit Fee: **\$0**  
Name of Facility: **Perstorp Polyols Inc Sloma**  
Person to Contact: **Anthony**  
Address: **600 Matzinger Rd  
Toledo, OH 43612**

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**600 Matzinger Rd  
Toledo, OHIO**

Description of modification:  
**Modification to Trimethylpropane and Sodium Formate Plt.**

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

**Perstorp Polyols Inc**  
**PTI Application: 04-01123**  
**Modification Issued: 1/27/2004**

Facility ID: **0448010133**

## **GENERAL PERMIT CONDITIONS**

### **TERMINATION OF PERMIT TO INSTALL**

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

### **NOTICE OF INSPECTION**

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

### **CONSTRUCTION OF NEW SOURCES**

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

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

### **PERMIT TO INSTALL FEE**

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

**Perstorp Polyols Inc**  
**PTI Application: 04-01123**  
**Modification Issued: 1/27/2004**

Facility ID: 0448010133

### **PUBLIC DISCLOSURE**

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

### **APPLICABILITY**

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

### **BEST AVAILABLE TECHNOLOGY**

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

### **PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION**

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

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

### **SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

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

5

**Perstorp Polyols Inc**

**PTI Application: 04-01123**

**Modification Issued: 1/27/2004**

Facility ID: **0448010133**

**Perstorp Polyols Inc**  
**PTI Application: 04-01123**  
**Modification Issued: 1/27/2004**

Facility ID: **0448010133**

#### **AIR EMISSION SUMMARY**

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

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P004	Sodium Formate drying and bagging	Wet scrubber for particulate	3745-31-05  3745-17-11 (A)(2)*  3745-17-07 (A)*	0.48 lb/hr PM 2.1 tons/yr PM 5% opacity as a three-minute average

This applicable rule is less stringent than the rule that resulted in the emission limitation.

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

<u>Pollutant</u>	<u>Tons/Year</u>	<u>Ton/Year Increase</u>
Particulate	2.1	0.7

#### **CONSTRUCTION STATUS**

**Perstorp Polyols Inc**  
**PTI Application: 04-01123**  
**Modification Issued: 1/27/2004**

Facility ID: **0448010133**

**The Toledo Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602.** 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: **\*\*P004\*\***.

### **PERFORMANCE TEST REQUIREMENTS**

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutant(s):

#### **Source**

#### **Pollutant(s)**

**P004**

**Particulate Matter**

### **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 **Toledo Division of**

**Perstorp Polyols Inc**  
**PTI Application: 04-01123**  
**Modification Issued: 1/27/2004**

Facility ID: **0448010133**

**Environmental Services, 348 South Erie Street, Toledo, Ohio 43602.**

### **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.

**Perstorp Polyols Inc**  
**PTI Application: 04-01123**  
**Modification Issued: 1/27/2004**

Facility ID: **0448010133**

### **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 **Toledo Division of Environmental Services, 348 South Erie Street, Toledo, Ohio 43602.**

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

### **AIR POLLUTION NUISANCES PROHIBITED**

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

### **NINETY DAY OPERATING PERIOD**

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

### **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.

### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

#### **A. Operational Restrictions**

1. The pressure drop across the scrubber shall be continuously maintained at a value of not less than the minimum static pressure drop (in inches of water) established during the most recent emission test that demonstrated that the emissions unit was in compliance while the emissions unit is in operation.
2. The scrubber water flow rate shall be continuously maintained at a value not less than the minimum water flow rate (in gallons per minute) established during the most recent emission test demonstrated that the emissions unit was in compliance while the emissions unit is in operation.

**B. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
2. The permittee shall collect and record the following information:
  - a. the pressure drop across the scrubber, in inches of water, on a once/day basis;
  - b. the scrubber water flow rate, in gallons per minute, on a once/day basis; and,
  - c. the operating times for the capture (collection) system, control device, monitoring equipment,
  - d. and the associated emissions unit each day.

**C. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify all period of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. the static pressure drop across the scrubber; and,
  - b. the scrubber water flow rate.
2. The reports shall be submitted quarterly, ie., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. If no deviations occurred during a calendar quarter. The permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**B. Testing Requirements**

1. The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements.

**Perstorp Polyols Inc**  
**PTI Application: 04-01123**  
**Modification Issued: 1/27/2004**

Facility ID: **0448010133**

- a. the emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emission unit will be operated, but not later than 180 days after initial startup.
- b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulate matter;
- c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

<u>Pollutant</u>	<u>Test Method</u>	<u>Location</u>
Particulates	Method 5	40 <u>CFR</u> Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;

- d. the test (s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Toledo Pollution Control Division;
  - e. not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Pollution Control Division. The "Intent to Test" notification shall describe in de tail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Toledo Pollution Control Division's refusal to accept the results of the emission test(s);
  - f. personnel from the Toledo Pollution Control Division shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emission unit and/or the performance of the control equipment; and,
  - g. a comprehensive written report on the results of the emissions test(s) shall be signed by the person or person responsible for the tests and submitted to the Toledo Pollution Control Division within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Pollution Control Division.
2. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

**Perstorp Polyols Inc**  
**PTI Application: 04-01123**  
**Modification Issued: 1/27/2004**

Facility ID: **0448010133**

a. Emission Limitation

0.48 pound/hour particulate matter.

**Perstorp Polyols Inc**  
**PTI Application: 04-01123**  
**Modification Issued: 1/27/2004**

Facility ID: **0448010133**

Applicable Compliance Method

The permittee shall use the results of the initial compliance test conducted in accordance with the procedures in Method 5 of 40 CFR Part 60, Appendix A for determining particulate matter emissions.

b. Emission Limitation

2.1 tons particulate matter/year.

Applicable Compliance Method

The permittee shall multiply the particulate matter emission rate (in pounds particulate matter/hour) as determined by the last emission test that demonstrated compliance by the annual hours of operation for this emission unit and divide by 2,000 pounds/hour.

Emission Limitation

5 percent opacity as a three minute average.

Appliance Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03 (B) (1).

**E. Miscellaneous Requirements**

1. The maximum capacity of P801 shall not exceed the maximum production rates of trimethylolpropane and of sodium formate stated in the application for PTI 04-1123. These production limits supersede the limits established in PTI No. 04-949 for P801.
2. The terms and conditions of this PTI supersede those established in PTI 04-949 for emissions unit P004.