



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
LUCAS COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 04-01397

Fac ID: 0448010133

DATE: 4/12/2005

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

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

CC: USEPA TDES Toledo Metropolitan Area Council of Governments IN MI

LUCAS COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 04-01397 FOR AN AIR CONTAMINANT SOURCE FOR
Perstorp Polyols Inc**

On 4/12/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Perstorp Polyols Inc**, located at **600 Matzinger Rd, Toledo, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 04-01397:

Adding air blower and pressuring Formaldehyde Plant P812 and increasing throughput of tanks T109 T110.

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

Karen Granata, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43602
[(419)936-3015]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 04-01397

Application Number: 04-01397
Facility ID: 0448010133
Permit Fee: **To be entered upon final issuance**
Name of Facility: Perstorp Polyols Inc
Person to Contact: Anthony Sloma
Address: 600 Matzinger Rd
Toledo, OH 43612

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

Description of proposed emissions unit(s):
Adding air blower and pressuring Formaldehyde Plant P812 and increasing throughput of tanks T109 T110.

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

Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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

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

11. Best Available Technology

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

12. Air Pollution Nuisance

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

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B. State Only Enforceable 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

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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. Permit Transfers

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

4. 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.

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5. 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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

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

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

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual

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

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	13.7
VOC	42.33 (2.1increase)

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Perstorp Polyols Inc

PTI Application: 04-01397

Issued: To be entered upon final issuance

Facility ID: 0448010133

Persto

PTI A

Emissions Unit ID: P812

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

Persto

PTI A

Emissions Unit ID: P812

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P812 - Formaldehyde manufacturing plant with electrically heated catalytic incinerator	OAC rule 3745-31-05(A)(3)	From Process: 3.13 lbs/hr of carbon monoxide (stack) 13.7 tpy of carbon monoxide (stack) 9.0 lbs/hr VOC (stack) 39.42 tpy VOC (stack) 2.9 tpy VOC (fugitive equipment leaks) See section A.I.2.a below
	OAC rule 3745-21-(09)(EE)	See section A.I.2.b below
	OAC rule 3745-21-09(DD)	See section A.I.2.c below
	40 CFR Part 60, Subpart VV	See section A.I.2.d below
	40 CFR Part 60, Subparts III	See section A.I.2.e below
	40 CFR Part 63, Subparts A, F, G and H	See section A.I.2.f below

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of 40 CFR

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Part 60, Subparts III and VV, 40 CFR Part 63, Subparts A, F, G and H, and OAC rule 3745-21-09(B)(4), (DD) and (EE).

- 2.b** The process vent stream from this emissions unit shall be vented to a combustion device that is designed and operated either to reduce the VOC emissions vented to it with an efficiency of at least 98%, by weight, or to emit VOC at a concentration less than 20 ppm, by volume, on a dry basis.
- 2.c** The permittee shall comply with the VOC leak detection and repair program requirements of OAC rule 3745-21-09(DD) by maintaining compliance with the operational restrictions, monitoring, recordkeeping and reporting requirements of 40 CFR Part 63, Subpart H for all VOC process equipment leaks.
- 2.d** The permittee shall comply with the VOC leak detection and repair program requirements of 40 CFR Part 60, Subpart VV by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart H for all VOC process equipment leaks.
- 2.e** The permittee shall comply with the VOC restrictions of 40 CFR Part 60, Subpart III by maintaining compliance with the operational restrictions, monitoring, record keeping and reporting requirements of 40 CFR Part 63, Subpart G for all air oxidation process vents.
- 2.f** The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subparts A, F, G, and H.

II. Operational Restrictions

- 1.** The permittee shall not employ water pumped from the Ottawa River to use as non-contact cooling water in this emissions unit.
- 2.** The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated the emission unit was in compliance. The average temperature across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Recordkeeping Requirements

- 1.** The permittee shall maintain daily records that document any time periods when water pumped

Emissions Unit ID: P812

from the Ottawa River was used as non-contact cooling water in this emissions unit.

2. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit or Celsius. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. The permittee shall collect and record the following information each day:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated the emission unit was in compliance; and
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.
4. The permittee shall keep a log or record of operating time for the capture (collection) system, the control equipment, the monitoring equipment and the emissions unit.

IV. Reporting Requirements

1. The permittee shall notify the Toledo Division of Environmental Services, in writing, of any daily record showing that water pumped from the Ottawa River was used as non-contact cooling water in this emissions unit. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitation specified above.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I -General Term and Condition A.1.c. of this permit.
4. The permittee shall submit quarterly summaries of the log or record of operating time for the capture (collection) system, the catalytic incinerator, the monitoring equipment and the emissions unit.

V. Testing Requirements

Emissions Unit ID: P812

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
3.13 lbs/hr of carbon monoxide (stack)

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Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

b. Emission Limitation:

13.7 tpy of carbon monoxide (stack)

Applicable Compliance Method:

The annual emission limitation is based on the hourly emission limitation (3.13 lbs/hr) multiplied by the number of hours in a year (8,760 hrs/yr) and divided by 2,000 pounds per ton. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual emission limitation.

c. Emission Limitation:

9.0 lbs/hr of VOC (stack)

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the methods and procedures specified in OAC rule 3745-21-10(C). Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

d. Emission Limitation:

39.42 tpy of VOC (stack)

Applicable Compliance Method:

The annual emission limitation is based on the hourly emission limitation (9.0 lbs/hr) multiplied by the number of hours in a year (8,760 hrs/yr) and divided by 2,000 pounds per ton. Therefore, compliance with the hourly emission limitation constitutes compliance with the annual emission limitation.

e. Emission Limitation:

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Persto

PTI A

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2.9 tpy of VOC (fugitive equipment leaks)

Emissions Unit ID: P812

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be demonstrated by using the emission factors from "Protocol for Equipment Leak Emission Estimates" EPA-453/R-95-017 November 1995 Table 2-5, or other approved alternate method, and the number of pumps, valves, flanges, etc. to calculate the pounds per hour of fugitive VOC emissions. The annual fugitive VOC emissions (in tons) shall be calculated by multiplying pounds per hour emission rate from all pumps, valves, flanges, etc. by the annual hours of operation of the equipment and dividing by 2000 pounds per ton.

f. Emission Limitation:

Reduction of VOC emissions by at least 98% or emit VOC at reduction of less than 20 ppm by volume, dry basis.

Applicable Compliance Method

If required, compliance shall be demonstrated using the procedures specified under OAC rule 3745-21-10(C).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emissions testing shall be conducted within 180 days after the effective date of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the control efficiency limitation (or discharge concentration) and the allowable mass emission rates for VOC and organic hazardous air pollutants.
 - c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 40 CFR Part 63 Subpart G and OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
 - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.

Issued: To be entered upon final issuance

- e. Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Director's refusal to accept the results of the emission tests.
- f. Personnel from the Toledo Division of Environmental Services shall be permitted to witness the tests, 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 emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

VI. Miscellaneous Requirements

1. The terms and conditions in this Permit to Install supercede all requirements for this emissions unit contained in PTI 04-1109.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T109- fixed roof storage tank for formaldehyde controlled by a closed vent system with an electrically heated catalytic incinerator	OAC rule 3745-31-05(A)(3)	0.007 tpy VOC
	40 CFR Part 60, Subpart Kb	See section A.I.2.a and d below
	40 CFR Part 63, Subpart A, F, G and H	See section A.I.2.b below See section A.I.2.c below

2. Additional Terms and Conditions

- 2.a The emissions from this emissions unit shall be vented to a catalytic incinerator with a minimum of 98% destruction efficiency.
- 2.b [63.110(b)(1)] A storage vessel that is also subject to the provisions of 40 CFR Part 60, Subpart Kb is required to comply only with the provisions of 40 CFR Part 63, Subpart G.
- 2.c The permittee shall comply with all applicable requirements of 40 CFR 63, Subparts A, F, G, and H.
- 2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb, and 40 Part 63 Subparts A, F, G and H.

II. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour

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block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated the emission unit was in compliance. The average temperature across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit or Celsius. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information each day:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit ((28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated the emission unit was in compliance;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - c. a log of the downtime for the capture (collection system, control device, and monitoring equipment when this emissions unit was in operation.
3. The permittee shall maintain records of the following information:
 - a. the types of organic liquids stored in the tank;
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid;
 - c. the throughput of the organic liquids stored in the tank (in gallons per rolling, 12-month period); and

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- d. the rolling, 12-month VOC emission calculated using the total rolling, 12-month throughput, volume of the tank, USEPA's "Tanks Program 4.0" or subsequent versions and the destruction efficiency determined during the most recent stack test which demonstrated compliance with the destruction efficiency requirement.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the VOC emissions from this emissions unit exceeded the VOC emission limitation.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I -General Term and Condition A.1.c. of this permit.

V. Testing Requirements

1. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:

0.007 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by a one time emissions calculation utilizing USEPA's "Tanks Program 4.0" or subsequent versions, the maximum number of turnovers per year (365), and the destruction efficiency of the catalytic incinerator (98%) . AP-42, Section 7.1 (9/97 version or later) may be used in lieu of "Tanks Program 4.0."
 - b. Emission Limitation:

The emissions from this emissions unit shall be vented to a catalytic incinerator with a minimum of 98% destruction efficiency.

Applicable Compliance Method:

If required, compliance shall be demonstrated using the procedures specified under OAC rule 3745-21-10(C).

VI. Miscellaneous Requirements

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Persto

PTI A

Emissions Unit ID: T109

Issued: To be entered upon final issuance

1. The terms and conditions in this Permit to Install supercede all requirements for this emissions unit contained in PTI 04-1043.

Persto

PTI A

Emissions Unit ID: T109

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions**2.a None****II. Operational Restrictions**

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T110- fixed roof storage tank for formaldehyde controlled by a closed vent system with an electrically heated catalytic incinerator	OAC rule 3745-31-05(A)(3)	0.007 tpy VOC
	40 CFR Part 60, Subpart Kb	See section A.I.2.a and d below
	40 CFR Part 63, Subpart A, F, G and H	See section A.I.2.b below See section A.I.2.c below

2. Additional Terms and Conditions

- 2.a The emissions from this emissions unit shall be vented to a catalytic incinerator with a minimum of 98% destruction efficiency.
- 2.b [63.110(b)(1)]. A storage vessel that is also subject to the provisions of 40 CFR Part 60, Subpart Kb is required to comply only with the provisions of 40 CFR Part 63, Subpart G.
- 2.c The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subparts A, F, G, and H.
- 2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Kb, and 40 Part 63 Subparts A, F, G and H.

II. Operational Restrictions

1. The average temperature of the exhaust gases immediately before the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit (28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated the emission unit was in compliance. The average temperature across the catalyst bed, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 80 percent of the average temperature difference during the most recent emission test that

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demonstrated the emissions unit was in compliance.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit or Celsius. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information each day:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit ((28 degrees Celsius) below the average temperature during the most recent emission test that demonstrated the emission unit was in compliance;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent emission test that demonstrated the emissions unit was in compliance; and
 - c. a log of the downtime for the capture (collection system, control device, and monitoring equipment when this emissions unit was in operation.
3. The permittee shall maintain records of the following information:
 - a. the types of organic liquids stored in the tank;
 - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each liquid;
 - c. the throughput of the organic liquids stored in the tank (in gallons per rolling, 12-month period); and
 - d. the rolling, 12-month VOC emission calculated using the total rolling, 12-month throughput, volume of the tank, USEPA's "Tanks Program 4.0" or subsequent versions and the destruction efficiency determined during the most recent stack test which demonstrated compliance with the destruction efficiency requirement.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time when the emissions unit was in operation during which the average temperature of the exhaust gases immediately before the catalyst bed or the average temperature difference across the catalyst bed does not comply with the temperature limitation specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the VOC emissions from this emissions unit exceeded the VOC emission limitation.
3. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part I -General Term and Condition A.1.c. of this permit.

V. Testing Requirements

1. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:
 - a. Emission Limitation:

0.007 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by a one time emissions calculation utilizing USEPA's "Tanks Program 4.0" or subsequent versions, the maximum number of turnovers per year (365), and the destruction efficiency of the catalytic incinerator (98%) . AP-42, Section 7.1 (9/97 version or later) may be used in lieu of "Tanks Program 4.0."
 - b. Emission Limitation:

The emissions from this emissions unit shall be vented to a catalytic incinerator with a minimum of 98% destruction efficiency.

Applicable Compliance Method:
If required, compliance shall be demonstrated using the procedures specified under OAC rule 3745-21-10(C).

VI. Miscellaneous Requirements

Persto

PTI A

Emissions Unit ID: T110

Issued: To be entered upon final issuance

1. The terms and conditions in this Permit to Install supercede all requirements for this emissions unit contained in PTI 04-1043.

Persto
PTI A

Emissions Unit ID: T110

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None