

Synthetic Minor Determination and/or  Netting Determination  
Permit To Install 06-06235  
Monroe Enterprises LLC

A. **Source Description**

This PTI application is for a proposed tanker truck trailer washing facility to be constructed in Monroe County, Ohio. The proposed facility will be located along the south side of Ohio Route 7. The trailer washing operation will be performed in a building that contains two bays for trailer washing. The primary purpose of the facility is to wash out the interiors of chemical-hauling trailers between loads of chemical products. Trailers containing residues of three general chemical types will be cleaned at the facility. The three chemical types are isocyanates, polyols, and miscellaneous organic compounds. It is anticipated that the facility will actually wash approximately 360 isocyanate trailers per year, 2,400 polyol trailers per year, and 240 miscellaneous organic compound trailers per year.

B. **Facility Emissions and Attainment Status**

The trailer washing operation is the lone air pollution source at this facility. Total facility OC emissions will be limited to 1.5 tons per year. Monroe County is designated attainment for all pollutants.

C. **Source Emissions**

The trailer washing operation will be vented to a smokeless flare which will achieve an outlet emission rate of 0.50 pounds OC per hour. The Operational Restrictions section of this permit will limit the number of isocyanate trucks cleaned to 16 per day.

D. **Conclusion**

The emission limitations, operational restrictions, monitoring, recordkeeping, reporting and testing requirements specified in this permit are adequate to insure compliance with the OEPA Toxics Policy.



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: DRAFT PERMIT TO INSTALL  
MONROE COUNTY**

**CERTIFIED MAIL**

**Application No: 06-06235**

**DATE: 9/12/2000**

Monroe Enterprises LLC  
James O'Neal  
16643 Jacintoport Blvd  
Houston, TX 77015

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 **\$200** 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.

Very truly yours,

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

cc: USEPA  
PA

SEDO WV  
Cheryl Green, Burgess & Niple SEDO DSW  
LTD CO DSW



**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 06-06235**

Application Number: 06-06235  
APS Premise Number: 0656000052  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Monroe Enterprises LLC  
Person to Contact: James ONeal  
Address: 16643 Jacintoport Blvd  
Houston, TX 77015

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**St Rt 7 and Twp Hwy 547  
Sardis, Ohio**

Description of proposed emissions unit(s):  
**Truck wash facility.**

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

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Director

**Monroe Enterprises LLC**

**Facility ID: 0656000052**

**PTI Application: 06-06235**

**Issued: To be entered upon final issuance**

## **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

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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

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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

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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 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.

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**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.

<b>SUMMARY (for informational purposes only)</b>	
<b>TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS</b>	
<u><b>Pollutant</b></u>	<u><b>Tons Per Year</b></u>
<b>OC</b>	<b>1.5 TPY</b>

**Mon]**  
**PTI /**

Emissions Unit ID: **P001**

**Issued: To be entered upon final issuance**

**PART II - SPECIAL**

**TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**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>
P001 - Truck wash facility vented to a smokeless flare.	OAC rule 3745-31-05(A)(3)	Organic compound(OC) emissions from this emissions unit shall not exceed the following:  0.50 pounds OC per hour,  1.5 tons OC per year.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

1. The number of truck trailers cleaned shall be limited to 16 per day.
2. A pilot flame shall be maintained at all times in the flare’s pilot light burner. The flare shall be connected to and operated during any time when a tank which contained an organic compound is being cleaned.
3. The permit to install for this emissions unit P001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA

**Mon****PTI**Emissions Unit ID: **P001****Issued: To be entered upon final issuance**

approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Monoethanolamine

TLV (mg/m<sup>3</sup>): 7.5 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 0.34 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 172.03 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 178ug/m<sup>3</sup>

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification

definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate, and maintain a device to continuously monitor the pilot flame when the emissions unit is in operation. The monitoring device and any recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record the following information each day:

- a. All periods during which there was no pilot flame.
  - b. The operating times for the flare, monitoring equipment, and the associated emissions unit.
2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
    - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
    - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
    - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
  3. The permittee shall collect and record the following information for each day for the tank cleaning operation:
    - a. The company identification for each material contained in the tanks prior to cleaning.
    - b. The number of tanks cleaned per hour and per day.
    - c. The organic compound (OC) content of each material cleaned from the tanks.
    - d. The name and identification of each cleanup material employed.
    - e. The number of gallons of the cleanup material employed.
    - f. The OC content of the cleanup material, in pounds per gallon.
    - g. The total OC emissions from the tank wash system, in pounds per day.

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- h. The total number of hours the emissions unit was in operation.
- i. The average hourly OC emissions vented to the flare, in lbs/hr.
- j. The average hourly OC emissions rate exiting the flare.  
(Multiply the average hourly OC emissions vented to the flare, in lbs/hr, by the control efficiency of the flare, i/e (i) x (1 - 98%).

**D. Reporting Requirements**

- 1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average OC emissions from the tank wash system exceeded 0.50 lbs/hr, and the actual average OC emissions for each such day.
  - b. All periods during which the pilot flame was not functioning properly. The reports shall include the date, time, and duration of each such period.
- 2. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

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

Emission Limitation

0.50 pounds OC per hour

Applicable Compliance Method

Compliance shall be determined by the monitoring and record keeping requirements contained in Section C.3. above.

**Monroe Enterprises LLC**  
**PTI A-0656000052**  
**Issue**

**Facility ID: 0656000052**

Emissions Unit ID: **P001**

Emission Limitation

1.5 tons OC per year.

Applicable Compliance Method

Compliance shall be determined by multiplying the sum of the 365 daily emissions by the control efficiency of the flare, i/e(1 - 98%) and then dividing by 2000.

Operational Restriction

The number of truck trailers cleaned shall be limited to 16 per day.

**Monr****PTI /****Issued: To be entered upon final issuance**Emissions Unit ID: **P001**Applicable Compliance Method

Compliance shall be determined by the monitoring and record keeping requirements contained in Section C.3. above.

**F. Miscellaneous Requirements**

None

**DIVISION OF SURFACE WATER PERMIT TO INSTALL TERMS AND CONDITIONS**

The proposed wastewater disposal system shall be constructed in strict accordance with the plans and application approved by the director of the Ohio Environmental Protection Agency. There shall be no deviation from these plans without the prior express, written approval of the agency. Any deviations from these plans or the above conditions may lead to such sanctions and penalties as provided for under Ohio law. Approval of this plan and issuance of this permit does not constitute an assurance by the Ohio Environmental Protection Agency 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.

The Southeast District office of the Ohio Environmental Protection Agency shall be notified in writing as to (a) the construction starting date; (b) the construction completion date; and (c) the date the wastewater disposal system was placed into operation.

The (owner Monroe Enterprises, LLC) shall be responsible for proper operation and maintenance of the wastewater disposal system. **(NOTE; USE "OWNER" ONLY WHEN SEWAGE SYSTEM OR TREATMENT WORKS IS TO BE A SEMI-PUBLIC, P.U.C.O OR INDUSTRIAL FACILITY)**