

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install: 06-08117

A. Source Description

A 82,200 gallon methyl methacrylate storage tank.

B. Facility Emissions and Attainment Status

NOVA is located in Washington County, which is currently in non-attainment status for ozone. Methyl methacrylate is required for production in the new Zylar line, currently still under construction.

C. Source Emissions

The facility is proposing a restriction in annual throughput to the storage tank of 5,000,000 gallons per year. Utilizing Tanks 4.0 the emissions from this tank are calculated to be 1.57 tons of OC per year.

According to Screens 3, the one-hour maximum ground level concentration will be 821.5 $\mu\text{g}/\text{m}^3$. The MAGLC is 4,875.35 $\mu\text{g}/\text{m}^3$.

D. Conclusion

With a maximum annual throughput restriction of 5,000,000 gallons of methyl methacrylate, the source will emit 1.57 tons of OC per year.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

**Application No: 06-08117
Fac ID: 0684010003**

DATE: 10/19/2006

NOVA Chemicals
Mark Cunningham
125 Dragstrip Rd.
Belpre, OH 45714

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 **\$250** 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, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

SEDO

WV

PA

WASHINGTON COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 06-08117 FOR AN AIR CONTAMINANT SOURCE FOR
NOVA Chemicals

On 10/19/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **NOVA Chemicals**, located at **Township Rd 97, Belpre**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-08117:

Chapter 31 modification for T006.

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.

Bruce Weinberg, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138 [(740)385-8501]



**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 06-08117

Application Number: 06-08117
Facility ID: 0684010003
Permit Fee: **To be entered upon final issuance**
Name of Facility: NOVA Chemicals
Person to Contact: Mark Cunningham
Address: 125 Dragstrip Rd.
Belpre, OH 45714

Location of proposed air contaminant source(s) [emissions unit(s)]:
**Township Rd 97
Belpre, Ohio**

Description of proposed emissions unit(s):
Chapter 31 modification for T006.

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

NOVA Chemicals

PTI Application: 06-08117

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0684010003

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

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,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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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.

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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	1.57

NOVA Chemicals

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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.

Operations, Property, and/or Equipment - (T006) - 82,200 gallon methyl methacrylate storage tank (This PTI supersedes the requirements of PTI 06-03746, issued 5/19/93.)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See Section 2.a. below.
OAC rule 3745-31-05(C)	1.57 tons of OC per year

2. Additional Terms and Conditions

- 2.a The permittee shall utilize submerged filling, a nitrogen blanket and a condenser on the tank vent to control emissions during operation.
- 2.b The allowable emissions of HAPs, as identified in Section 112(b) of Title III of the Clean Air Act, from emission units P001, P002, P005, P006, P007, P008, P012, P013, P014, P015, B001, B002, T006, T007, T008, B003, B004, B005, B006, and any exempt or de minimus sources shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based upon a rolling, 12-month summation.

B. Operational Restrictions

1. The permittee has requested a federally enforceable limit on throughput to remain under the threshold of Title V for HAPs. Therefore the maximum annual throughput shall not exceed 5,000,000 gallons of methyl methacrylate based on a 12 month rolling summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the throughput limits specified in the following table:

<u>Month</u>	<u>Maximum Throughput (gallons)</u>
1	569,390

Emissions Unit ID: T006

1-2	1,138,781
1-3	1,708,171
1-4	2,277,561
1-5	2,846,951
1-6	3,416,341
1-7	3,985,731
1-8	4,555,121
1-9	5,000,000
1-10	5,000,000
1-11	5,000,000
1-12	5,000,000

After the first 12 calendar months of operation following the startup of emissions unit T006, compliance with the annual throughput limitation shall be based upon a rolling 12-month summation of the operating hours.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain readily accessible records showing the following:
 - a. The dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the source.
2. The permittee shall maintain monthly records of the following information:
 - a. The throughput for T006 for each month.
 - b. During the first 12 calendar months of operation following the issuance of this permit, the cumulative throughput in gallons, calculated by adding the current month's throughput to the throughput for each calendar month since the issuance of this permit.
 - c. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the throughput, calculated by adding the current month's throughput to the throughput for the preceding eleven calendar months.
3. The permittee shall maintain the following monthly information for all of the emissions units at the facility:
 - a. the total emissions of each individual HAP, in tons;

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- b. the aggregate sum of all HAPs combined, in tons;
 - c. the rolling, 12-month summation of each individual HAP, in tons; and
 - d. the rolling, 12-month summation of all HAPs combined, in tons.
4. The permit to install for this emissions unit (T006) 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Methacrylate

TLV (mg/m³): 204.76

Maximum Hourly Emission Rate (lbs/hr): 1.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 821.5

MAGLC (ug/m³): 4,875.35

5. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

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- 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.).
6. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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 the 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.

D. Reporting Requirements

- 1. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual material throughput limitations. Exceedances of the rolling, 12 month summation shall be reported within 30 days of the exceedance. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred during that year. These reports shall be submitted by January 31st of each year.
- 2. The permittee shall submit quarterly deviation (excursion) reports that document all

Emissions Unit ID: T006

exceedances of the rolling, 12-month summations for the HAP emission limitations specified in A.2.b above. The reports shall be submitted to the Director (the Ohio EPA, Southeast District Office) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following method:

- a. Emission Limitation
1.57 tons of organic compounds (OC)/year

Applicable Compliance Method

The permittee shall demonstrate compliance with calculations determined by U.S. EPA Tanks 4.0 program with a maximum annual material throughput of 5,000,000 gallons.

F. Miscellaneous Requirements

None