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Facility Name: **Southside River Rail Corp**

Application Number: **14-4542**

Date: **July 29, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

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

NOTICE OF INSPECTION

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

CONSTRUCTION OF NEW SOURCE(S)

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio 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

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

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

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

APPLICABILITY

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

BEST AVAILABLE TECHNOLOGY

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

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

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

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for 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.

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AIR EMISSION SUMMARY

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

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
T005	1,500,000 gallon methyl methacrylate storage tank with vapor return and a scrubber	Use of a vapor return system that is at least 90 percent efficient, use of a scrubber that is at least 75 percent efficient, throughput limitations, and compliance with the Air Toxics Policy.	3745-31-05 3745-21-07 (D) 3745-15-07 40 CFR Part 60, Subpart Kb	0.99 TPY OC* See Term and Condition A.2. See Term and Condition F.1. See Term and Condition C.1. * based on a rolling 12-month summation

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	0.99

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

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<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
T005	1,500,000 gallon methyl methacrylate storage tank	Kb

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and **Hamilton County Dept. of Env. Services**
1632 Central Parkway
Cincinnati, OH 45210

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

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WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

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

NEW SOURCE PERFORMANCE STANDARD SUBPART Kb

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b(a) and (b), the owner and operator of the following storage vessel(s) shall keep readily accessible records showing the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for the life of each source.

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<u>Source Number(s)</u>	<u>Tank Size</u>
T005	1,500,000 gallons

In addition,

- A. In accordance with 40 CFR 60.116b(a) and (c), the owner and operator of the, following storage vessel(s) shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. Records shall be retained for a minimum of two years.

<u>Source Number(s)</u>	<u>Tank Size</u>
T005	1,500,000 gallons

- B. In accordance with 40 CFR 60.116b(a) and (d), the owner and operator of the following storage vessel(s) shall notify the local field office within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range. Records shall be retained for a minimum of two years.

<u>Source Number(s)</u>	<u>Tank Size</u>
T005	1,500,000 gallons

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.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

1. The maximum emissions from emissions unit T005 shall not exceed the following:

Methyl Methacrylate (OC): 0.99 TPY

2. The storage of volatile photochemically reactive materials as defined in OAC 3745-21-01 (C)(7) is prohibited in emissions unit T005.

B. Operational Restrictions

1. Throughput Limitation

The maximum annual throughput rate for emissions unit T005 shall not exceed 31,565,655 gallons, based upon a rolling, 12-month summation of the throughput rate.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the throughput levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Throughput</u>
1	2,630,471 gallons
1-2	5,260,942 gallons
1-3	7,891,413 gallons
1-4	10,521,884 gallons
1-5	13,152,355 gallons
1-6	15,782,826 gallons
1-7	18,413,297 gallons
1-8	21,043,768 gallons
1-9	23,674,239 gallons
1-10	26,304,710 gallons
1-11	28,935,181 gallons
1-12	31,565,655 gallons

After the first 12 calendar months of operation, compliance with the annual throughput rate limitation shall be based upon a rolling, 12-month summation of the throughput rates.

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2. Vapor Return (Balance) System Requirements

- a. For any transfer of methyl methacrylate from a delivery vessel to the stationary storage tank (T005), the vapors displaced from the stationary storage tank shall be processed by a vapor balance system which is equipped with a vapor tight vapor line from the stationary storage tank to the delivery vessel and a means to ensure that the vapor line is connected before methyl methacrylate can be transferred and which is designed and operated to route at least 90 percent by weight of the VOC in the displaced vapors to the delivery vessel.
- b. For any transfer of methyl methacrylate from the stationary storage tank to a delivery vessel, the vapors displaced from delivery vessel shall be processed by a vapor balance system which is equipped with a vapor tight vapor line from the delivery vessel to the stationary storage tank being unloaded and a means to ensure that the vapor line is connected before methyl methacrylate can be transferred and which is designed and operated to route at least 90 percent by weight of the VOC in the displaced vapors to the stationary storage tank.

3. Vapor Return System Operational Practices

- a. The vapor balance system shall be kept in good working order and shall be used at all times during the transfer of methyl methacrylate.
- b. The delivery vessel hatches shall be closed at all times during the loading and unloading of the delivery vessel.
- c. There shall be no leaks in the delivery vessel pressure/vacuum relief valves and hatch covers.
- d. There shall be no leaks in the vapor and liquid lines during the transfer of methyl methacrylate.

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- e. The pressure relief valves on the stationary storage tanks and delivery vessels shall be set to release at no less than 0.7 pound per square inch gauge or the highest possible pressure (in accordance with State or local fire codes, or the "National Fire Prevention Association" guidelines).

4. Scrubber Requirements

The permittee shall operate and maintain a scrubber to control odors from emissions unit T005 that is at least 75 percent efficient.

C. Monitoring and Recordkeeping Requirements

1. The permittee shall maintain records as required by 40 CFR 60.116b (a), (b), (c) and (d).
2. The permittee shall maintain monthly records of the following information:
 - a. the throughput rate for each month; and,
 - b. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the throughput rates.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative throughput rate for each calendar month.

3. The permittee shall maintain records of any leak checks, including, at a minimum, the following information:
 - a. date of inspection;
 - b. findings (may indicate no leaks discovered or location, nature, and severity of each leak);
 - c. leak determination method;
 - d. corrective action (date each leak repaired and reasons for any repair interval in excess of 15 calendar days); and,

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- e. inspector's name and signature.
4. Each record and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month throughput rate limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative throughput rates.
2. 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 preventative measures which have been or will be taken, shall be submitted to the Hamilton County Dept. of Env. Services. 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).

E. Compliance Methods/Testing Requirements

1. Compliance with the throughput limitations in Term B.1 shall be demonstrated by the required recordkeeping in Term C.2

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F. Miscellaneous Requirements

1. If probable cause exists indicating this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3475-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this emissions unit into compliance.