



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
BUTLER COUNTY
Application No: 14-04945
Fac ID: 1409030749**

CERTIFIED MAIL

DATE: 1/9/2007

Superior Oil Company Inc
Richard Paul
400 West Regent Street
Indianapolis, IN 462251995

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of \$ 0 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

HCDES

OH-KY-IN Regional Council of Gov.

KY

IN

BUTLER COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-04945 FOR AN AIR CONTAMINANT SOURCE FOR
Superior Oil Company Inc**

On 1/9/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Superior Oil Company Inc**, located at **320 Northpointe Drive, Fairfield, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-04945:

PTI includes a drum filling station and a blower fan. The modification is to correct the emissions unit identifications. This PTI modification shall supercede the PTI 14-04945, issued 7/3/2001.

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.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy,
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install
Terms and Conditions**

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

DRAFT MODIFICATION OF PERMIT TO INSTALL 14-04945

Application Number: 14-04945
Facility ID: 1409030749
Permit Fee: **To be entered upon final issuance**
Name of Facility: Superior Oil Company Inc
Person to Contact: Richard Paul
Address: 400 West Regent Street
Indianapolis, IN 462251995

Location of proposed air contaminant source(s) [emissions unit(s)]:

**320 Northpointe Drive
Fairfield, Ohio**

Description of proposed emissions unit(s):

PTI includes a drum filling station and a blower fan. The modification is to correct the emissions unit identifications. This PTI modification shall supercede the PTI 14-04945, issued 7/3/2001.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Laura Powell
Acting Director

Superior Oil Company Inc

Facility ID: 1409030749

PTI Application: 14-04945

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

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 (i.e., postmarked) quarterly 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 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

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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	14.6
HAPs	9.9/24.9

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 - (P004) - Drum filling station with submerged fill - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 TPY OC. See term and condition B.1. The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C) Synthetic minor to avoid title V permitting requirements	See term and condition A.2.b.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations and submerged fill.
- 2.b The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units Loading Rack (P001), Drum Filling Line (P002), Solvent Blend Tank (P003), Drum Filling Station with submerged fill (P004), Blower Fan for cleaning tanker trucks (P005), 1500 gallon Solvent Blend Tank (P006), Fixed Roof Storage Tank with submerged fill (T001), Fixed Roof Storage Tank with submerged fill (T002), Fixed Roof Storage Tank with submerged fill (T003), Fixed Roof Storage Tank with submerged fill (T004), Fixed Roof Storage Tank with submerged fill (T005), Fixed Roof Storage Tank with submerged fill (T006), 10,000 gallon Fixed Roof Storage Tank with submerged fill (T007), 10,000 gallon Fixed Roof Storage Tank with submerged fill (T008), 10,000 gallon Fixed Roof Storage Tank with submerged fill (T009), 10,000 gallon Fixed Roof Storage Tank with submerged fill (T010), 10,000 gallon Fixed Roof Storage Tank with submerged fill (T011), 10,000 gallon Fixed Roof Storage Tank with submerged fill (T012), and a 6,000

Emissions Unit ID: **P004**

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gallon Solvent Storage Tank with submerged fill (T013) including any de minimis air contaminant sources, as defined

Emissions Unit ID: **P004**

in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for the total of all HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee shall comply with the rolling, 12-month limitation immediately upon startup under this permit based on past records of monthly HAP emissions.

B. Operational Restrictions

1. The permittee shall employ a submerged fill process when operating the drum filling station.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the drum filling operation:
 - a. the company identification for each liquid organic material;
 - b. the number of gallons of throughput for each liquid organic material;
 - c. the molecular weight of each liquid organic material (lbs./lb-mole);
 - d. the vapor pressure (psia) of each liquid organic material;
 - e. the total organic compound emission rate for all liquid organic materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic compound emission rate for all organic materials, i.e., (e)/(f), in pounds per hour (average).
2. The permittee shall maintain monthly records of the OC emissions and the material use from the coatings and cleanup materials for this emissions unit. The OC emissions shall be summarized in tons per year at the end of each calendar year.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.b:

Emissions Unit ID: **P004**

- a. The name and identification number of each liquid material transferred;
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each liquid material in gallon of individual HAP per gallon of material;
 - c. The total combined HAP content of each liquid material in gallon of combined HAPs per gallon of material [sum all the individual HAP contents from (b)];
 - d. The number of gallons transferred of each liquid material;
 - e. The total individual HAP emissions for each HAP from all liquid materials, in pounds or tons per month (b x d x loading loss emission factor from AP-42);
 - f. The total combined HAP emissions from all liquid materials, in pounds or tons per month [sum of all individual HAP emissions in (e)];
 - g. The updated rolling, 12-month summation of individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - h. The updated rolling, 12-month summation of total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.
4. The permit to install for emissions unit P004 was evaluated based on the actual materials (typically coatings and cleanup 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 approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Allowable Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emissions Unit ID: **P004**

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Pollutant: Ethylene Glycol

TLV (ug/m3): 100,000

Maximum Hourly Emission Rate (lbs/hr): 8.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1800

MAGLC (ug/m3): 2381

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

Emissions Unit ID: **P004**

"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");
- 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 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

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runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Hamilton County Department of Environmental Services which include the following information:

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- a. An identification of each hour during which the organic compound emissions from the liquid organic materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour;
 - b. An identification of each day during which the organic compound emissions from the liquid organic materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day; and
 - c. Deviation reports shall follow the requirements and reporting schedule in the General Terms and Conditions of this permit to install.
2. The permittee shall also submit annual reports to the Hamilton County Department of Environmental Services which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the emission units identified in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

E. Testing Requirements

1. Compliance with the emission limitations in term and condition A.1 shall be determined using the following equation from Paint and Ink Manufacturing, Chapter 8 (2000) and AP-42, 5th edition (1995), Chapter 5:

Emission Limitations:

Organic compound (OC) emissions shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 TPY.

Applicable Compliance Methods:

Mixing losses are the sum of the following equation for each species in the blend:

$$E = [M_x \cdot K_x \cdot A \cdot P_x \cdot 3600 \text{ seconds/hour} \cdot H / (R \cdot T)] \cdot B$$

where:

E = emissions of VOC species, in lb/hr;

M_x = molecular weight of VOC species [x], in lb/lbmole;

Emissions Unit ID: **P004**

Kx = gas-phase mass transfer coefficient for VOC species [x], in ft/sec, where Kx can be obtained by the following formula:

$$Kx = 0.00438 * U^{0.78} * [18/Mx]^{1/3} \text{ using } U = \text{wind speed} = 0.1 \text{ mph};$$

A = surface area of tank (ft.²) where A can be obtained by the following formula:

$$A = 28.27 \text{ feet}^2 \text{ for a tank with a diameter of } 6 \text{ feet};$$

Px = true vapor pressure of VOC species [x] (if a pure chemical is used) partial pressure of mixture [x] (if a mixture of VOCs is used) at temperature (T) in pounds per square inch at 1 atmosphere (psia), where the partial pressure of mixtures can be obtained by the following formula:

$$Px = mx * VPx$$

where:

mx = liquid mole fraction of VOC species [x] in moles of VOC species [x]/moles of total mixture [x], where mx can be obtained by the following formula:

$$mx = (zx/Mx) / (\text{sum } zx/Mx);$$

zx = liquid mass fraction of VOC species [x] in lb of species [x]/lb of total mixture [x];

VPx = true vapor pressure of VOC species [x] in psia;

R = the universal gas constant at 1 atmosphere of pressure which is 10.73 psia-feet³/degree R-lb-mole;

T = temperature of the liquid in degree R, if temperature in degree F, then use the following: degree F + 460;

H = batch time in hours per batch of blend produced; and

B = number of batches of blend produced per hour.

E mix = E species 1 + E species 2 + E species 3.

Loading losses are the sum of the following equation for each species in the blend:

Loading losses in lbs/1000 gallons = 12.46 SPM/T where

S = saturation factor = 0.5;

P = true vapor pressure of the liquid loaded in psia;

M = molecular weight in lbs/lb-mole; and

T = temperature of bulk liquid loaded in degree R, if temperature in degree F, then use the following: degree F + 460.

E loss = Loading losses * gallons/hour = emissions/hour

Loading losses = E species 1 + E species 2 + E species 3 = lbs of OC/hr for the blend produced.

THE = total hourly emissions = mixing losses (lbs/hr) + loading losses (lbs/hr) = lbs

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of OC emissions emitted per hour.

Daily emissions = THE in lbs/hr * hr/batch of blend produced * batches of blend produced/day = lbs of OC emissions emitted per day.

Annual emissions = THE in pounds per hour * hr/batch of blend produced * batches of blend produced per year divided by 2000 lbs = TPY of OC emitted.

2. Compliance with the HAP emissions limitations cited in term and condition A.2.b shall be demonstrated by the record keeping in term and condition C.3.

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F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C.1 - C.3, D, and E.
2. The terms and conditions listed in this permit to install shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 14-04945 as issued on July 3, 2001.

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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 - (P005) - Blower fan for cleaning tanker trucks - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 7.3 TPY OC. See terms and conditions B.1 and B.2. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C).
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.
OAC rule 3745-31-05(C) Synthetic minor to avoid title V permitting requirements	See term and condition A.2.b.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.

2.b The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units Loading Rack (P001), Drum Filling Line (P002), Solvent Blend Tank (P003), Drum Filling Station with submerged fill (P004), Blower Fan for cleaning tanker trucks (P005), 1500 gallon Solvent Blend Tank (P006), Fixed Roof Storage Tank with submerged fill (T001), Fixed Roof Storage Tank with submerged fill (T002), Fixed Roof Storage Tank with submerged fill (T003), Fixed Roof Storage Tank with submerged fill (T004), Fixed Roof Storage Tank with submerged fill (T005), Fixed Roof Storage Tank with submerged fill (T006), 10,000 gallon Fixed Roof Storage Tank with submerged fill (T007), 10,000 gallon Fixed Roof Storage Tank with submerged fill (T008), 10,000 gallon Fixed Roof Storage Tank with submerged fill (T009), 10,000 gallon Fixed Roof Storage Tank with submerged fill (T010), 10,000 gallon Fixed

Emissions Unit ID: **P005**

Roof Storage Tank with submerged fill (T011), 10,000 gallon Fixed Roof Storage

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Tank with submerged fill (T012), and a 6,000 gallon Solvent Storage Tank with submerged fill (T013) including any de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for the total of all HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee shall comply with the rolling, 12-month limitation immediately upon startup under this permit based on past records of monthly HAP emissions.

B. Operational Restrictions

1. The permittee shall install, operate and maintain a blower fan rated at 2500 acfm. If a different size fan is installed, the permittee shall notify the Hamilton County Environmental Services - Air Quality Division prior to the change.
2. The permittee shall not operate this emissions unit for more than 4 tanker trucks per day.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the tanker truck drying operation:
 - a. The company identification for each liquid organic material evaporated from each tanker truck.
 - b. The number of minutes to blow dry each tanker truck.
 - c. The number of tanker trucks blown dry per day.
 - d. The organic compound content of each material blown dry in each tanker truck, in pounds OC per gallon.
 - e. The total organic compound emission rate for all liquid organic materials evaporated from the tanker trucks, in pounds per day. This is the sum of $[1.095 \text{ gallons/truck} * (d)]$ for each truck processed during the day.
 - f. The total number of hours the emissions unit was in operation, in hours per day.
 - g. The average hourly organic compound emission rate for all materials, i.e.,

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(e)/(f), in pounds per hour (average).

Note: See equations in the testing section, Section E.1. Test results indicate 1.095 gallons of residual material per truck.

2. The permittee shall collect and record the total annual organic compound emission rate for all liquid materials evaporated from the tanker trucks, in pounds or tons per year (annual sum of data from term and condition C.1.e).
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.b:
 - a. The name and identification number of each liquid material evaporated.
 - b. The total individual HAP emissions for each HAP from all liquid materials evaporated, in pounds or tons per month (see term E.1).
 - c. The total combined HAP emissions from all liquid materials evaporated, in pounds or tons per month (see term E.1).
 - d. The updated rolling, 12-month summation of individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - e. The updated rolling, 12-month summation of total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Hamilton County Department of Environmental Services which include the following information:
 - a. An identification of each hour during which the organic compound emissions from the evaporated liquid organic materials exceeded 8 pounds per hour, and

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the actual organic compound emissions for each such hour.

- b. An identification of each day during which the organic compound emissions from the evaporated liquid organic materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. Deviation reports shall follow the requirements and reporting schedule in the General Terms and Conditions of this permit to install.
2. The permittee shall also submit annual reports to the Hamilton County Department of Environmental Services which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
 3. The permittee shall submit to the Hamilton County Department of Environmental Services quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAP emission limitations for the emission units identified in term and condition A.2.b. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 shall be determined using the following equations:

Emission Limitations

Organic compound (OC) emissions shall not exceed 8 lbs/hr, 40 lbs/day and 7.3 TPY.

Applicable Compliance Method

Emissions OC (lbs/hr) = Lbs of OC emitted/day divided by the hours of operation of emissions unit P005/day.

Emissions of OC in lbs/day

= sum of lbs of OC emitted from each liquid organic material evaporated during the day.

= sum of [1.095 residual gallons/truck x organic compound content of the liquid organic material in the truck (lbs./gallon) x number of trucks blown dry per day].

Emissions OC in tons per year = the sum of the daily emissions rates for each day of

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operation in the calendar year.

2. Compliance with the HAP emission limitations in term and condition A.2.b shall be demonstrated by the record keeping in Section C.3.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D and E.
2. The terms and conditions listed in this permit to install shall supersede all the air pollution control requirements for this emissions unit contained in permit to install 14-04945 as issued on July 3, 2001.