

1

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 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 approval constitutes a violation of Ohio Administrative Code

2

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

(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.

3

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

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.

4

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

5

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Perstorp Polyols, Inc.** located in **Lucas** 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>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P802	Formaldehyde manufacturing plant; air oxidation process with catalytic oxidation	Fugitive VOC leaks (pumps, valves, etc.)	Compliance with NSPS Subpart III, compliance with MACT and the hazardous organic NESHAP rule subpart; 98 percent destruction efficiency by weight Leak detection and repair program

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
			repair program	
Applicable Federal & OAC Rules		Permit Allowable Mass Emissions and/or Control/Usage Requirements	7.02 tons/year VOC	
3745-31-05	3745-21-09 (B) (4) **	2.5 pound/hour CO		
	3745-21-09 (EE) **	11.0 tons/year CO		
	3745-21-09 (DD)	0.64 pound/hour formaldehyde		
	NSPS Subpart VV	2.8 tons/year formaldehyde		
		2.5 pounds/hour methanol		
		11.0 tons/year methanol		
		7.5 pounds/hour dimethyl ether		
	3745-31-05	32.9 tons/year dimethyl ether		
		13.14 pounds/hour VOC*		
		57.7 tons/year VOC*		
40 CFR Section 63 Subpart F and G		catalytic incineration to reduce emissions of TOC (minus methane and ethane) by 98 weigh percent		
		leak detection and		

Facility Name: **Perstorp Polyols, Inc**
 Application Number: **04-1109**
 Date: **August 19, 1998**

** This applicablerules is less stringent than the rule that resulted in the emission limitation.

SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>	<u>Tons/Year Increase</u>
CO	11.0	+ 6.18
Formaldehyde	2.8	+ 1.6
Methanol	11.0	+ 6.2
Dimethyl ether	32.9	+18.4
VOC*	64.72	+38.54

* Includes formaldehyde, methanol and dimethyl ether totals.

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.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P802	Formaldehyde manufacturing process	III
	Fugitive VOC leaks	VV

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

8

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

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 **Toledo Environmental Control**
348 South Erie Street
Toledo, OH 43602

PERFORMANCE TEST REQUIREMENTS

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.

9

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

Source

Pollutant(s)

P802

**Formaldehyde, CO,
Methanol, Dimethyl ether**

- D. Tests shall include a determination of the uncontrolled mass rate of emissions.

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Toledo Environmental Control, 348 South Erie Street, Toledo, OH 43602.**

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

10

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

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 **Toledo Environmental Control 348 South Erie Street, Toledo, OH 43602.**

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.

11

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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.

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.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The permittee shall not employ water pumped from the Ottawa River to use as noncontact cooling water in source P802.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall keep up-to-date, readily accessible records of the following data measured during each performance test, and also include the following data in the report of the initial performance test required under 40 CFR Section 60.8. The same data specified in this section shall be submitted in the reports of all subsequently required performance tests where the

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

emission control efficiency of a control device is determined.

- a. The average temperature upstream and downstream of the catalyst bed for the catalytic incinerator measured at least every 15 minutes and averaged over the same time period of the performance testing; and,
 - b. the percent reduction of TOC determined as specified in subpart 60.614(b) achieved by the incinerator.
2. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately upstream and downstream of the incinerator's catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit and have an accuracy of plus or minus 1 percent of the temperature being monitored or plus or minus 1 degree Fahrenheit, whichever is greater. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorder(s) shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
3. The permittee shall collect and record the following information for each day for the control equipment:
- a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and,

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

- c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference during the most recent performance test that demonstrated the emissions unit was in compliance.
4. The permittee shall install, calibrate, maintain, and operate a flow indicator that provides a record of vent stream flow to the incinerator at least once every hour for the affected facility. The flow incinerator shall be installed in the vent stream from each affected facility at a point closest to the inlet of the incinerator and before being joined with any other vent stream.
5. The permittee shall keep up-to-date, readily accessible continuous records of the flow indication specified under subpart 60.613(a)(2), as well as up-to-date records of all periods when the vent stream is diverted from the control device of has no flow rate.
6. In order to comply with OAC rule 3745-21-09(DD) and NSPS Subpart VV, a leak detection and repair program for equipment in the process unit shall be developed and implemented in accordance with the requirements specified in paragraphs (DD)(2)(b) to (DD)(2)(m) of OAC rule 3745-21-09 and NSPS Subpart VV.

C. Reporting Requirements

1. The permittee shall notify the Administrator of the US EPA (Administrator) of the specific provisions of 40 CFR 60.612(60.612(a)(b) or (c)) which the permittee has elected to comply. Notification shall be submitted with the notification of initial start-up required by subpart 60.7(a)(3). If the permittee elects at a later date to use an alternative provision of subpart 60.612 with which to comply, then the Administrator shall be notified by the permittee 90 days before implementing a change and, upon implementing the change, a performance test shall be performed as specified by subpart 60.614 within 180 days.

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

2. The permittee shall submit quarterly summaries of the following records:
 - a. a log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature of the exhaust gases during the most recent performance test that demonstrated the emissions unit was in compliance; and,
 - c. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature difference across the catalyst bed was less than 80 percent of the average temperature difference of the bed during the most recent performance test that demonstrated the emissions unit was in compliance.

These quarterly reports shall be submitted by April 30, July 31, October 31 and January 31, and shall cover the records for the previous calendar quarters.

3. In order to maintain compliance with OAC rule 3745-21-09(DD) semiannual reports shall be submitted to the Toledo Division of Environmental Services by January 31 and July 31 and shall include the following information for the preceding semiannual periods:
 - a. the process unit identification;
 - b. the number of pumps in light liquid service excluding those pumps designated for no detectable emissions under the provision of paragraph (DD)(2)(i) of this rule and those pumps complying with paragraph (DD)(2)(d)(iii) of this rule;
 - c. the number of valves in gas/vapor service or in light liquid service excluding those valves

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

designated for no detectable emission under the provision of paragraph (DD) (2) (d) (iv) of this rule and those valves subject to the alternative standard for monitoring under the provision of paragraph (DD) (2) (d) (v) of this rule;

- d. the number of compressors excluding those compressors designated for no detectable emissions under the provision of paragraph (DD) (3) (c) of this rule and those compressors complying with paragraph (DD) (3) (d) or (DD) (3) (e) of this rule;
- e. for each month during the semiannual period:
 - i. the number of pumps in light liquid service for which leaks were detected as described in paragraph (DD) (2) (g) of this rule;
 - ii. the number of pumps in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;
 - iii. the number of valves in gas/vapor service or in light liquid service for which leaks were detected as described in paragraph (DD) (2) (g) of this rule;
 - iv. the number of valves in gas/vapor service or in light liquid service for which leaks were not repaired within fifteen calendar days after the date of leak detection;
 - v. the number of compressors for which leaks were detected as described in paragraph (DD) of this rule;
 - vi. the number of compressors for which leaks were not repaired within fifteen calendar days after the date of leak detection; and,
 - vii. the facts that explain each delay of repair allowed pursuant to paragraph

16

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

(DD) (11) of this rule; and,

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

- viii. the dates of process unit shutdowns that occurred within the semiannual period; and,
- f. the permittee shall submit to the Administrator quarterly reports of all periods recorded under subpart 60.615(d) when the vent stream is diverted from the control device or has no flow rate. The initial report shall be submitted within 6 months after the initial start-up-date. Subsequent reports shall be submitted to the Administrator by January 31, April 30, July 31 and October 31 and shall include information for the preceding quarter.

D. Testing Requirements

- 1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. the emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emission unit will be operated, but not later than 180 days after initial startup;
 - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emissions limitations for formaldehyde, methanol, dimethyl ether and CO along with the destruction efficiency of TOC (minus methane and ethane);
 - c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

<u>Pollutant</u>	Dimethyl ether	Formaldehyde
CO		Methanol

18

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

<u>Test Method</u>	<u>Location</u>
10	40 CFR Part 60, Appendix A
18	40 CFR Part 60, Appendix A
0011	40 CFR Part 266, Appendix IX
308	40 CFR Part 63, Appendix A

d. the test method which must be employed to demonstrate compliance with the control efficiency limitation for reducing the emissions of TOC (minus methane and ethane) is specified below:

<u>Pollutant</u>	<u>Test Method</u>	<u>Location</u>
TOC	1 or 1A	40 CFR Part 60, Appendix A and 60.614
	2, 2A, 2C, or 2D	40 CFR Part 60, Appendix A and 60.614
	3	40 CFR Part 60, Appendix A and 60.614
	4	40 CFR Part 60, Appendix A and 60.614
	18	40 CFR Part 60, Appendix A and 60.614

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA;

- e. the test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Toledo Environmental Control;
- f. the control efficiency (i.e., the percent

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

reduction in mass emission between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration of the potential presence of interfering gases;

- g. not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Environmental Control. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Toledo Environmental Control's refusal to accept the results of the emission test(s);
 - h. personnel from the Toledo Environmental Control shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and,
 - i. a comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Environmental Control within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Environmental Control.
2. In order to maintain compliance with OAC rule 3745-21-09(DD) the permittee shall collect and report the following information to the Toledo Division of

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

Environmental Services:

- a. for compliance tests required under paragraph (DD) (7) (c) and (DD) (9) (c) of this rule, the requirements of paragraphs (A) (3) and (A) (4) of rule 3745-21-10 of the Administrative Code (pertaining to notification of intent to test) shall be met. The results of such compliance test shall be reported to the Toledo Division of Environmental Services within thirty days after the test date; and,
 - b. the results of compliance tests required under paragraph (DD) (4) (c) of this rule shall be reported semiannually to the Toledo Division of Environmental Services. The semiannual reports shall be submitted by January 31 and July 31 and shall include information for the preceding semiannual period.
3. The test method for determining compliance with OAC rule 3745-21-09(DD) is specified in OAC rule 3745-21-10(F) except as otherwise provided in paragraphs (DD) (2) (c) and (DD) (2) (d) of OAC rule 3745-21-09.
4. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):
- a. Emission Limitation
2.5 pounds/hour CO

Applicable Compliance Method

The permittee shall use the results of the initial compliance test conducted in accordance with the procedures in Method 10 of 40 CFR Part 60, Appendix A for determining CO emissions.
 - b. Emission Limitation
75 tons CO/year

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

Applicable Compliance Method

The permittee shall multiply the CO emission rate (in pounds CO/hour) as determined by the last emission test that demonstrated compliance by the annual hours of operation for this emission unit and divide by 2,000 pounds/hour.

c. Emission Limitation

0.64 pound/hour formaldehyde

Applicable Compliance Method

The permittee shall use the results of the initial compliance test conducted in accordance with the procedures in Method 0011 of 40 CFR Part 266, Appendix IX for determining formaldehyde emissions.

d. Emission Limitation

2.8 tons formaldehyde/year

Applicable Compliance Method

The permittee shall multiply the formaldehyde emission rate (in pounds formaldehyde/hour) as determined by the last emission test that demonstrated compliance by the annual hours of operation for this emission unit and divide by 2,000 pounds/hour.

e. Emission Limitation

2.5 pounds/hour methanol

Applicable Compliance Method

The permittee shall use the results of the initial compliance test conducted in accordance with the procedures in Method 308 of 40 CFR Part 63, Appendix A for determining formaldehyde emissions.

22

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

f. Emission Limitation

75 tons methanol/year

Applicable Compliance Method

The permittee shall multiply the methanol emission rate (in pounds/methanol/hour) as determined by the last emission test that demonstrated compliance by the annual hours of operation for this emission unit and divide by 2,000 pounds/hour.

g. Emission Limitation

7.5 pounds/hour dimethyl ether

Applicable Compliance Method

The permittee shall use the results of the initial compliance test conducted in accordance with the procedures in Method 18 of 40 CFR Part 60, Appendix A for determining dimethyl ether emissions.

h. Emission Limitation

32.9 tons dimethyl ether/year

Applicable Compliance Method

The permittee shall multiply the dimethyl ether emission rate (in pounds dimethyl ether/hour) as determined by the last emission test that demonstrated compliance by the annual hours of operation for this emission unit and divide by 2,000 pounds/hour.

i. Emission Limitation

13.14 pounds/hour VOC

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

Applicable Compliance Method

The permittee shall use the results of the initial compliance test conducted in accordance with the procedures in Method 25 of 40 CFR Part 60, Appendix A for determining VOC emissions.

j. Emission Limitation

57.7 tons VOC/year

Applicable Compliance Method

The permittee shall multiply the VOC emission rate (in pounds VOC/hour) as determined by the last emission test that demonstrated compliance by the annual hours of operation for this emission unit and divide by 2,000 pounds/hour.

k. Emission Limitation

Reduce emissions of TOC (minus methane and ethane) by 98 weight percent.

Applicable Compliance Method

The permittee shall use the results of the initial compliance test conducted in accordance with the procedures in Method 18 of 40 CFR Part 60, Appendix A for determining VOC emissions (in pounds VOC/hour) for the inlet and outlet of the control system. The percent reduction shall be determined by subtracting the outlet emission rate from the inlet emission rate and dividing that amount by the inlet emission rate and multiplying by 100 percent.

l. Emission Limitation

7.02 tons VOC/year

Applicable Compliance Method

The permittee shall use the emission factors from

Facility Name: **Perstorp Polyols, Inc**

Application Number: **04-1109**

Date: **August 19, 1998**

"Control Techniques for Fugitive VOC Emissions from Chemical Process Facilities" EPA/625/R-93/005 March 1994 Table 7-2 and the number of pumps, valves, flanges, etc. to calculate the pounds/hour of fugitive VOC emission. The annual fugitive VOC emissions (in tons VOC/year) shall be calculated by multiplying pounds/hour emission rate by the annual hours of operation of the equipment and dividing by 2,000 pounds/ton.

E. Miscellaneous Requirements

1. Due to the length of the following regulations they are incorporated by reference:

OAC Rule 3745-21-09 (EE)
 3745-21-09 (B) (4)
 3745-21-09 (DD)

NSPS Subpart III
NSPS Subpart VV
40 CFR Section 63 Subparts F and G

2. It is Perstorp Polyols, Inc. responsibility to review these regulations to ensure compliance and to incorporate any requirements of the regulations into the design of P802. This includes any recordkeeping and reporting requirements.