



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

4/20/2011

Certified Mail

Charles Gasperetti  
ISP  
1220 South Metcalf Street  
Lima, OH 45804

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0302020343  
Permit Number: P0103657  
Permit Type: Initial Installation  
County: Allen

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-NWDO; Indiana





## Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	0302020343
Facility Name:	ISP
Facility Description:	Industrial Organic Chemicals, n.e.c.
Facility Address:	1220 South Metcalf Street Lima, OH 45804 Allen County
Permit #:	P0103657, Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Lima News on 03/01/2011. The comment period ended on 03/31/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **None**

- a. Comment: Under condition C.1(a)(1) (on page 14), the reference to conditions b)(1)a. and b)(2)a. should be removed because the PTE emissions from this emission unit, including fugitive, are and should be federally enforceable emission limitations.
- b. Response: **The requested change has been made.**

2. Topic: **None**

- a. Comment: Under condition C.1(b)(1)a. (on page 14), the PTI reference for P801 and N006 should be changed to permit number P0107710. The PTI #03-17448 does not account for increase in emissions associated with the new emission unit P807 on this permit.
- b. Response: **The requested change has been made.**

3. Topic: **None**

- a. Comment: Under condition C.1(b)(2)a. (on page 15), the last sentence should be replaced with "The federally enforceable emission limitations are based on the operational restriction in accordance with 40 CFR Part 60 Subpart NNN and 40 CFR Part 63 Subpart G.
- b. Response: **The requested change has been made.**

4. Topic: **None**

- a. Comment: Under condition C.1(b)(2)a.ii. and C.1(b)(2)a.ii. (on page 15), the PTI reference for P801 and N006 respectively should be changed to P0107710. As above, PTI #03-17448 does not account for increase in emissions associated with the new emission unit P807 on this PTI.
- b. Response: **The requested change has been made.**

5. Topic: **None**

- a. Comment: Under condition C.1(b)(2)d. (on page 16), the sentence should be replaced with “The LDAR program shall comply with the appropriate provisions (including operational restrictions, monitoring and recordkeeping, reporting and testing) of 40 CFR Part 63 Subpart H (National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks).” This is similar to language in our Title V Permit for consistency.
- b. Response: **The requested change has been made.**

6. Topic: **None**

- a. Comment: Under condition C.1(c)(1) (on page 17), the sentence should be replaced with “The permittee shall comply with the following control requirements for this emission unit.” This is similar to the language in our Title V Permit for consistency.
- b. Response: **The language in the permit is currently the way we are writing terms and conditions associated with OAC rule 3745-31-05(D). We spoke to the company on April 8, 2011 and it was agreed that the requested change would not be made.**

7. Topic: **None**

- a. Comment: Under condition C.1(c)(1)a.ii. (on page 17), the reference to the maleic acid scrubber should be deleted because it is not emissions control equipment. It is process equipment used to convert maleic anhydride to maleic acid which is then fed to the 1,4-butandiol reactor. The sentence should be replaced with “The boiler shall achieve a destruction efficiency greater than or equal to 99% for gaseous VOC (associated with emission unit N006).” This is similar to the language in our Title V Permit for consistency.
- b. Response: **The requested change has been made.**

8. Topic: **None**

- a. Comment: Under condition C.1(f)(1)a. (on page 18), the last sentence should be replaced with “Compliance shall be demonstrated by calculations of annual emissions using the above equation or monitoring data from the LDAR program in conjunction with EPA SOCOMI correlations equation and the actual annual hours of operation.” This will afford ISP the opportunity to utilize monitoring data (i.e. screening values) to calculate actual emission for fugitive.
- b. Response: **The requested change has been made.**

9. Topic: **None**

- a. Comment: Under condition C.2(b)(2)c. (on page 21), the sentence should be replaced with “The LDAR program shall comply with the appropriate provisions (including operational restrictions, monitoring and recordkeeping, reporting and testing) of 40 CFR Part 63 Subpart H (National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks).” This is similar to language in our Title V Permit for consistency.
- b. Response: **The requested change has been made.**



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
ISP**

Facility ID:	0302020343
Permit Number:	P0103657
Permit Type:	Initial Installation
Issued:	4/20/2011
Effective:	4/20/2011





Division of Air Pollution Control
Permit-to-Install
for
ISP

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## Authorization

Facility ID: 0302020343  
Facility Description: Industrial Organic Chemicals, n.e.c.  
Application Number(s): A0035567  
Permit Number: P0103657  
Permit Description: Tetrahydrofuran (THF) Recovery Process, including the installation of two new distillation columns, two new BHT (Butylate hydrotoluene) Addition vessels, two new THF product storage tanks, and an insignificant BHT tank.  
Permit Type: Initial Installation  
Permit Fee: \$1,000.00  
Issue Date: 4/20/2011  
Effective Date: 4/20/2011

This document constitutes issuance to:

ISP  
1220 South Metcalf Street  
Lima, OH 45804

of a Permit-to-Install for the emissions unit(s) identified on the following page.

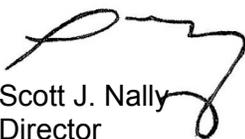
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0103657

Permit Description: Tetrahydrofuran (THF) Recovery Process, including the installation of two new distillation columns, two new BHT (Butylate hydrotoluene) Addition vessels, two new THF product storage tanks, and an insignificant BHT tank.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>P807</b>
Company Equipment ID:	P807
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: 70,000 gallon Storage Tanks**

<b>Emissions Unit ID:</b>	<b>T104</b>
Company Equipment ID:	T104
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>T105</b>
Company Equipment ID:	T105
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**

**1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### 4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
  - (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The

written 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. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

- (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. 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.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- 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 state-only required 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 Ohio EPA DAPC, Northwest District Office. 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.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

**12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

**13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. 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.

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## **B. Facility-Wide Terms and Conditions**

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. This facility is subject to 40 CFR, Part 60, Subpart Kb, New Source Performance Standards: Volatile Organic Liquid Storage Vessels. The permittee shall comply with all applicable requirements of 40 CFR, Part 60, Subpart Kb. The permittee shall also comply with all applicable requirements of 40 CFR, Part 60, Subpart A (General Provisions.) Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR, Part 60, Subparts Kb and Subpart A. The NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
3. This facility is subject to 40 CFR, Part 63, Subpart F, National Emission Standards for Hazardous Air Pollutants: Synthetic Organic Chemical Manufacturing Industry. The permittee shall comply with all applicable requirements of 40 CFR, Part 63, Subpart F. The permittee shall also comply with all applicable requirements of 40 CFR, Part 63, Subpart A (General Provisions) as identified in 40 CFR, Part 63, Subpart F. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR, Part 63, Subparts F and Subpart A. The NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
4. This facility is subject to 40 CFR, Part 63, Subpart G, National Emission Standards for Hazardous Air Pollutants: Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations and Wastewater. The permittee shall comply with all applicable requirements of 40 CFR, Part 63, Subpart G. The permittee shall also comply with all applicable requirements of 40 CFR, Part 63, Subpart A (General Provisions) as identified in 40 CFR, Part 63, Subpart G. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR, Part 63, Subparts G and Subpart A. The NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.
5. This facility is subject to 40 CFR, Part 63, Subpart H, National Emission Standards for Hazardous Air Pollutants: Equipment Leaks. The permittee shall comply with all applicable requirements of 40 CFR, Part 63, Subpart H. The permittee shall also comply with all applicable requirements of 40 CFR, Part 63, Subpart A (General Provisions) as identified in 40 CFR, Part 63, Subpart H. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR, Part 63, Subparts H and Subpart A. The NESHAP General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

## **C. Emissions Unit Terms and Conditions**

**1. P807, Tetrahydrofuran Recovery Process**

**Operations, Property and/or Equipment Description:**

Tetrahydrofuran recovery process to further purify a tetrahydrofuran co-product of the 1,4-butanediol manufacturing process.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	Fugitive Process Emissions:6.77 tons volatile organic compounds (VOC)/year  The emissions from this process that are vented to the flare associated with emissions unit P801 are accounted for in allowable emissions for emissions unit P801 [See PTIP0107710].  The emissions from this process that are vented to the scrubber off-gas boiler (SOGB) are accounted for in allowable emissions for emissions unit N006 [See PTI P0107710].  See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-21-09(DD)	See b)(2)d.
e.	40 CFR, Part 60, Subpart VV [40 CFR Part 60.480 – 60.489]	See b)(2)d.
f.	40 CFR, Part 60, Subpart NNN [40 CFR Part 60.660 – 60.668]	See b)(2)e.
g.	40 CFR, Part 60, Subpart RRR [40 CFR Part 60.700 – 60.708]	See b)(2)f.

h.	40 CFR, Part 63, Subpart F [40 CFR Part 63.100 – 63.107]	See c)(3), d)(2), e)(2) and f)(2)
i.	40 CFR, Part 63, Subpart G [40 CFR Part 63.110 – 63.153]	See b)(2)g., c)(4), d)(3), e)(3) and f)(3)
j.	40 CFR, Part 63, Subpart H [40 CFR Part 63.160 – 63.183]	See b)(2)d., c)(5), d)(4), e)(4) and f)(4)
k.	40 CFR, Part 63, Subpart A [40 CFR Part 63.1 – 63.15]	Table 3 of Subpart F of 40 CFR, Part 63 – Applicability of General Provisions to Subpart F shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.  Table 1A of Subpart G of 40 CFR, Part 63 – Applicability of General Provisions to Subpart G shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.  Table 4 of Subpart H of 40 CFR, Part 63 – Applicability of General Provisions to Subpart H shows which parts of the General Provisions in 40 CFR 63.1 – 15 apply.

(2) Additional Terms and Conditions

- a. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD) requirements. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) and in 40 CFR, Part 60, Subpart NNN and 40 CFR, Part 63, Subpart G:
  - i. Fugitive Emissions: 6.77 tons VOC/year;
  - ii. The emissions from this process that are vented to the flare associated with emissions unit P801 are accounted for in allowable emissions for emissions unit P801 [See PTI P0107710].; and
  - iii. The emissions from this process that are vented to the scrubber off-gas boiler (SOGB) are accounted for in allowable emissions for emissions unit N006 [See PTI P0107710].
- b. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D); therefore, the permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit.

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265

changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, the requirements under this rule no longer apply.

It should be noted that the emission limitations and control requirements established pursuant to OAC rule 3745-31-05(D) will remain applicable after the above SIP revisions are approved by U.S. EPA.

- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a), as effective December 1, 2006, do not apply to the VOC emissions from this air contaminant source since the controlled potential to emit (PTE) is less than 10 tons per year taking into consideration federally enforceable requirements established under OAC rule 3745-31-05(D).

- d. 40 CFR, Part 60, Subpart VV regulations overlap with those of 40 CFR, Part 63, Subpart H. 40 CFR 63.160(b) and (c) address this overlap and state that equipment subject to 40 CFR, Part 60, Subpart VV is required to comply only with the provisions of 40 CFR, Part 63, Subpart H.

The requirements of the applicable standards in OAC rule 3745-21-09(DD) are equivalent to or less stringent than the leak detection and repair (LDAR) monitoring plan submitted by the permittee, pursuant to 40 CFR Part 63, Subpart H.

The permittee shall include the appropriate process equipment and regulated components for emissions unit P807 in the current site fugitive LDAR program. The LDAR program shall comply with the appropriate provisions (including operational restrictions, monitoring and record keeping, reporting, and testing) of 40 CFR, Part 63, Subpart H (National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.)

- e. 40 CFR, Part 60, Subpart NNN regulations overlap with those of 40 CFR, Part 63, Subpart G. 40 CFR 63.110(d) addresses this overlap and states that equipment subject to 40 CFR, Part 60, Subpart NNN is required to comply only with the provisions of 40 CFR, Part 63, Subpart G.
- f. 40 CFR, Part 60, Subpart RRR regulations overlap with those of 40 CFR, Part 63, Subpart G. 40 CFR 63.110(d) addresses this overlap and states that equipment subject to 40 CFR, Part 60, Subpart RRR is required to comply only with the provisions of 40 CFR, Part 63, Subpart G.
- g. Pursuant to 40 CFR 63.113(h), the permittee is not required to make a group determination as described in 40 CFR 63.115 because it complies with 40 CFR 63.113(a)(1) or (a)(2).

- h. Emissions unit P807 is vented to the boiler that also controls the emissions from emissions unit N006. All operational restrictions, monitoring, record keeping, reporting and testing requirements for the boiler are established in the terms and conditions for emissions unit N006. Therefore, no additional monitoring, record keeping, reporting and testing requirements are necessary for this emissions unit.
- i. Emissions unit P807 is vented to a flare that also controls the emissions from emissions unit P801. All operational restrictions, monitoring, record keeping, reporting and testing requirements for the flare are established in the terms and conditions for emissions unit P801. Therefore, no additional monitoring, record keeping, reporting and testing requirements are necessary for this emissions unit.

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements which limit the PTE for VOC emissions [See b)(2)a.]:

a. Emissions from this emissions unit (P807) shall be vented to a closed process vent. The closed process vent system shall meet the following control requirements:

- i. The boiler shall achieve a destruction efficiency greater than or equal to 99% for gaseous VOCs [existing boiler associated with emissions unit N006]; and
- ii. all process vent emissions not routed to a thermal oxidizer shall be combusted in a flare [existing butanediol (BDO) flare associated with emissions unit P801.]

(2) The closed vent system shall be operated at all times when emissions may be vented to it.

(3) See 40 CFR, Part 63, Subpart F (40 CFR 63.100 – 63.107)

(4) See 40 CFR, Part 63, Subpart G (40 CFR 63.110 – 63.153)

(5) See 40 CFR, Part 63, Subpart H (40 CFR 63.160 – 63.183)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records that document operating time for the closed vent system. The information shall be maintained in the company's files for a period of five years.

(2) See 40 CFR, Part 63, Subpart F (40 CFR 63.100 – 63.107)

(3) See 40 CFR, Part 63, Subpart G (40 CFR 63.110 – 63.153)

(4) See 40 CFR, Part 63, Subpart H (40 CFR 63.160 – 63.183)

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all periods of time when the closed vent system was not operational.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(2) See 40 CFR, Part 63, Subpart F (40 CFR 63.100 – 63.107)

(3) See 40 CFR, Part 63, Subpart G (40 CFR 63.110 – 63.153)

(4) See 40 CFR, Part 63, Subpart H (40 CFR 63.160 – 63.183)

f) Testing Requirements

(1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:Fugitive Process Emissions – 6.77 tons VOC/yr

Applicable Compliance Method: The process fugitive emission limitation was developed in accordance with the following equation:

$$PFE = [\text{summation of } NiSi \times (\text{hrs/yr}) \times (\text{ton}/2000 \text{ lbs})] \text{ for } i=1 \text{ to } n$$

where:

PFE = process fugitive VOC emissions, tons/yr

Ni = number of pipe fitting components i

Si = SOCM emission factor for pipe fitting component i(EPA-450/3-010, April 1982) for pipe fitting component i and/or site specific emission factors derived in accordance with USEPA approved protocols.

Compliance shall be demonstrated by calculations of annual emissions using the above equation or monitoring data from the LDAR program in conjunction with the USEPA SOCM correlations equation and the actual annual hours of operation.

(2) See 40 CFR, Part 63, Subpart F (40 CFR 63.100 – 63.107)

(3) See 40 CFR, Part 63, Subpart G (40 CFR 63.110 – 63.153)

(4) See 40 CFR, Part 63, Subpart H (40 CFR 63.160 – 63.183)

g) Miscellaneous Requirements

(1) None.

**2. Emissions Unit Group -70,000 gallon Storage Tanks: T104, T105,**

EU ID	Operations, Property and/or Equipment Description
T104	70,000 gallon Tetrahydrofuran product storage tank
T105	70,000 gallon Tetrahydrofuran product storage tank

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	1.57 tons volatile organic compounds (VOC)/yr, from emissions units T104 and T105, combined  See b)(2)a.
	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.
	OAC rule 3745-21-09(L)	See c)(4), d)(3), d)(4) and e)(2)
	OAC rule 3745-21-09(DD)	See b)(2)c.
b.	40 CFR Part 60, Subpart Kb	b)(2)e., c)(1) through c)(3), d)(1), d)(2) and e)(1)
c.	40 CFR Part 60, Subpart VV	See b)(2)c.
d.	40 CFR Part 63, Subpart F	See c)(6), d)(6), e)(4) and f)(2)
e.	40 CFR Part 63, Subpart G	See b)(2)d., c)(7), d)(7), e)(5) and f)(3)
f.	40 CFR Part 63, Subpart H	See b)(2)c., c)(8), d)(8), e)(6) and f)(4)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the

December 1, 2006 version of 3745-31-05, the requirements under this rule no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the volatile organic compound (VOC) emissions from these air contaminant sources since the uncontrolled potential to emit for VOC is less than ten tons per year.

- c. 40 CFR, Part 60, Subpart VV regulations overlap with those of 40 CFR, Part 63, Subpart H. 40 CFR 63.160(b) and (c) address this overlap and state that equipment subject to 40 CFR, Part 60, Subpart VV is required to comply only with the provisions of 40 CFR, Part 63, Subpart H.

The requirements of the applicable standards in OAC rule 3745-21-09(DD) are equivalent to or less stringent than the alternative LDAR monitoring plan submitted by the permittee, pursuant to 40 CFR Part 63, Subpart H.

The permittee shall include the appropriate process equipment and regulated components for emissions units T104 and T105 in the current site fugitive LDAR program. The LDAR program shall comply with the appropriate provisions (including operational restrictions, monitoring and record keeping, reporting, and testing) of 40 CFR 63, Subpart H (National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.)

- d. Pursuant to 40 CFR 63.113(h), the permittee is not required to make a group determination as described in 40 CFR 63.115 because it complies with 40 CFR 63.113(a)(1) or (a)(2).
- e. The permittee shall properly install and operate control equipment for emission units T104 and T105 to comply with the following control equipment requirements:
  - i. a fixed roof in combination with an internal floating roof meeting the following specifications:
    - (a) the internal floating roof shall be equipped with a mechanical shoe or liquid mounted seal closure device between the wall of the storage tank and the edge of the internal floating roof;
    - (b) the internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it). The floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the tank is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible;

- (c) each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents shall provide a projection below the liquid surface;
  - (d) each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use;
  - (e) automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports;
  - (f) rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting;
  - (g) each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening;
  - (h) each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover; and,
  - (i) each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- c) Operational Restrictions
- (1) If the inspection required in Section d)(1)a. or d)(1)c. for storage tanks T104 and T105 reveals holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage tank.
  - (2) If the inspection required in Section d)(1)b. for storage tanks T104 and T105 detects any failures, the permittee shall repair the items or empty and remove the storage tank from service within 45 days. If a failure cannot be repaired within 45 days and if the storage tank cannot be emptied with 45 days, a 30-day extension may be requested in the inspection report required by Section e)(1)c. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the storage tank will be emptied as soon as possible.
  - (3) If the inspection required in Section d)(1)a. or d)(1)c. for storage tanks T104 and T105 detects any failures, the permittee shall repair the items as necessary so that none of the defects exist before refilling the storage tank with volatile organic liquid (VOL).

- (4) The permittee shall install the following control equipment and shall maintain tank vents, seals, and or covers as follows:
  - a. The fixed roof storage tank shall be equipped with an internal floating roof.
  - b. The automatic bleeder vents shall be closed at all times except when the roof is floated off or landed on the roof leg supports.
  - c. The rim vents, if present, shall be set to open or at the manufacturer's recommended setting when the roof is being floated off the roof leg supports.
  - d. All openings, except stub drains, shall be equipped with a cover, seal, or lid which is to be in a closed position at all times except when in actual use for tank gauging or sampling.
  
- (5) The permittee shall not exceed the maximum annual throughputs listed for the following emissions units:
  - a. T104 and T105—4,500,000 gallons/yr combined
  
- (6) See 40 CFR, Part 63, Subpart F (40 CFR 63.100 – 63.107)
  
- (7) See 40 CFR, Part 63, Subpart G (40 CFR 63.110 – 63.153)
  
- (8) See 40 CFR, Part 63, Subpart H (40 CFR 63.160 – 63.183)
  
- d) **Monitoring and/or Recordkeeping Requirements**
  - (1) The permittee is subject to the following inspection requirements for storage tanks T104 and T105:
    - a. the internal floating roof, the primary seal, and the secondary seal shall be visually inspected for holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof prior to filling the storage tank with volatile organic liquid;
    - b. the internal floating roof, the primary seal, and the secondary seal shall be visually inspected through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. The inspection shall be performed to detect the following failures:
      - i. the internal floating roof is not resting on the surface of the VOL inside the storage tank;
      - ii. liquid has accumulated on the roof;
      - iii. the seal is detached; and,
      - iv. there are holes or tears in the seal fabric.
    - c. the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals shall be visually inspected each time the storage tank is emptied and degassed (in no event shall inspections conducted in

accordance with this requirement occur at intervals greater than 10 years). The inspection shall be performed to detect the following failures:

- i. internal floating roof defects;
- ii. holes, tears, or other openings in the seal or the seal fabric;
- iii. gaskets no longer close off the liquid surfaces from the atmosphere; and,
- iv. slotted membrane has more than 10 percent open area.

The permittee shall keep copies of all inspection reports required above for at least 2 years in accordance with 40 CFR 60.115b.

- (2) 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 for 40 CFR Part 60 are also federally enforceable.

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

- (3) The permittee shall maintain records of the following information for the fixed roof tank:
- a. the types of petroleum liquids stored in the tank; and
  - b. the maximum true vapor pressure (in pounds per square inch absolute), as stored, of each petroleum liquid that has a maximum true vapor pressure greater than 1.0 pound per square inch absolute.

These records shall be maintained for at least 5 years and shall be made available to the Director or his representative upon verbal or written request.

- (4) The permittee shall maintain a record of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit and per the rules.
- (5) The permittee shall maintain monthly records of the amount of material throughput for emissions units T104 and T105, combined, in gallons per month and total gallons, to date, for the calendar year.
- (6) See 40 CFR, Part 63, Subpart F (40 CFR 63.100 – 63.107)
- (7) See 40 CFR, Part 63, Subpart G (40 CFR 63.110 – 63.153)
- (8) See 40 CFR, Part 63, Subpart H (40 CFR 63.160 – 63.183)

e) Reporting Requirements

- (1) The permittee shall comply with the follow reporting requirements for emission units T104 and T105:
  - a. the permittee shall provide written notification for the following:
    - i. dates modification construction commenced postmarked no later than 30 days after such date;
    - ii. anticipated date of initial startup postmarked not more than 60 days nor less than 30 days prior to such date; and,
    - iii. actual date of initial startup postmarked within 15 days after such date.
  - b. the permittee shall provide written notification at least 30 calendar days prior to the filling or refilling of a storage tank for which an inspection is required by Section d)(1)a. or d)(1)c. If the inspection required by Section d)(1)c. is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the storage tank, the permittee shall notify the Ohio EPA at least 7 days prior to the refilling of the storage tank. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned.
  - c. After installing control equipment required by Section d)(1)b.i., the permittee shall submit a report that describes the control equipment and certifies that the control equipment meets the specifications of Section d)(1)b.i. and Section c)(3). This report shall be an attachment to the notification required by Section e)(1)a.
  - d. if the annual inspection required by Section d)(1)b.reveals any failures as outlined by Section d)(1)b.i, d)(1)b.ii., d)(1)b.iii., and d)(1)b.iv., a report shall be submitted within 30 days of the inspection. Each report shall identify the storage tank, the nature of the defects, and the date the storage tank was emptied or the nature of and date the repair was made.

The permittee shall keep copies of all reports required above for at least 2 years in accordance with 40 CFR 60.115b.
- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of the occurrence, of any period of time in which the automatic bleeder vents, rim vents, and all openings other than stub drains were not maintained as required in this permit.
- (3) The permittee shall submit annual deviation (excursion) reports which identify all exceedances of the throughput restrictions contained in section c)(5) for emission units T104 and T105. These reports shall include the corrective actions that were taken to achieve compliance and shall be submitted by January 31 of each year.
- (4) See 40 CFR, Part 63, Subpart F (40 CFR 63.100 – 63.107)
- (5) See 40 CFR, Part 63, Subpart G (40 CFR 63.110 – 63.153)
- (6) See 40 CFR, Part 63, Subpart H (40 CFR 63.160 – 63.183)

f) Testing Requirements

(1) Compliance Methods Requirements:

Compliance with the emission limitations listed in the Air Emission Summary of this PTI shall be determined in accordance with the following method:

- a. Emission Limitation: 1.57 tons VOC/yr combined from emission units T104 and T105

Applicable Compliance Method:The tons/yr limitation was developed using emissions generated by EPA, AP-42 TANKS 4.09d computer program using a maximum annual tetrahydrofuran combined throughput of 4,500,000 gallons. Compliance shall be demonstrated by using the TANKS 4.09d computer program and the actual annual throughput from recordkeeping specified in Section d)(3).

- (2) See 40 CFR, Part 63, Subpart F (40 CFR 63.100 – 63.107)

- (3) See 40 CFR, Part 63, Subpart G (40 CFR 63.110 – 63.153)

- (4) See 40 CFR, Part 63, Subpart H (40 CFR 63.160 – 63.183)

g) Miscellaneous Requirements

- (1) None.