



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 06-06072

DATE: 3/15/00

Shell Elastomers LLC
Kimberly Mommessin
2982 Washington Blvd
Belpre, OH 45714-1842

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

SEDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 06-06072

Application Number: 06-06072
APS Premise Number: 0684010011
Permit Fee: **\$800**
Name of Facility: Shell Elastomers LLC
Person to Contact: Kimberly Mommessin
Address: 2982 Washington Blvd
Belpre, OH 457141842

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

2982 Washington Blvd
Belpre, Ohio

Description of proposed emissions unit(s):

K-1 Railcar Loading Facility.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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.
- b. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping 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 appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. 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.

5. Termination of Permit To Install

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

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental 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 emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

7. 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.

8. 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).

9. 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.

10. 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.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate Matter	7.0

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

**Part III - SPE
CIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F003 - K-1 Railcar Loading Facility	OAC rule 3745-31-05 OAC rule 3745-17-08(B)	There shall be no visible emissions from the K-1 Railcar Loading Facility.
	OAC rule 3745-17-07	This requirement is less stringent than developed through OAC rule 3745-31-05 above.

2. Additional Terms and Conditions

- 2.a The permittee shall employ best available control measures on the K-1 Railcar Loading Station for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee shall operate the emissions unit in such a manner that there are no visible emissions. Nothing in this paragraph shall prohibit the permittee from employing additional control measures to ensure compliance.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, while the equipment is in operation, for any visible emissions of fugitive dust from the emissions unit. A record of the necessary and completed corrective actions resulting from the daily checks shall be maintained by the permittee.
2. 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.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports which identify each day that the observations required under the monitoring section of this permit were not performed and each day that any corrective measures required to be taken pursuant to the monitoring section of this permit were not performed.

V. Testing Requirements

1. Compliance with the emission limitations identified above shall be determined in accordance with the following methods:
 - a. Emission Limitation:

No visible emissions of fugitive dust

Applicable Compliance Method:

If required, Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

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Shell E

PTI A₁

Issued: 3/15/00

Emissions Unit ID: **F003**

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F003 - K-1 Railcar Loading Facility	OAC rule 3745-31-05	Particulate emissions shall not exceed 7.0 TPY.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Emissions Limitation
7.0 tons of particulates per year
Applicable Compliance Method

Compliance shall be demonstrated by using a one time calculation of the emission units potential to emit as follows:

$$3.13 \text{ lb/hr uncontrolled} * 0.50 * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 7.0 \text{ TPY}$$

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 06-06072 Facility ID: 0684010011

FACILITY NAME Shell Elastomers LLC

FACILITY DESCRIPTION K-1 Railcar Loading Facility CITY/TWP Belpre

SIC CODE 2822 SCC CODE 30101866 EMISSIONS UNIT ID F003

EMISSIONS UNIT DESCRIPTION K-1 Railcar Loading Facility

DATE INSTALLED Already Installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	No Visible Emissions	7.0	No Visible Emissions	7.0
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No

NESHAP? No

PSD? No

OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

The emissions unit shall have no visible emissions.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$Minimal

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 06-06072 Facility ID: 0684010011

FACILITY NAME Shell Elastomers LLC

FACILITY DESCRIPTION K-1 Railcar Loading Facility CITY/TWP Belpre

NEW SOURCE REVIEW FORM B

PTI Number: 06-06072 Facility ID: 0684010011

FACILITY NAME Shell Elastomers LLC

FACILITY DESCRIPTION K-1 Railcar Loading Facility CITY/TWP Belpre

PTI REVIEW CHECKLIST

PTI # 06-06072

COMPLETE PACKAGE? - Check items (if included), arrange in this order

- 1. BAT/T&C forms named; on L: drive
- 2. Notes, explanation
- 3. Netting/Syn. Minor
- 4. ERFs, Calculations
- 5. Modeling

CALCULATIONS

ALL EMISSIONS UNITS

- Uncontrolled hourly (max hourly in absence of controls)
- Uncontrolled annual (uncontrolled hourly x 8760)
- Actual hourly (max hourly after controls)
- Actual annual (actual hourly x actual hours)
- Allowable hourly (hourly limit allowed in T&Cs)
- Allowable annual (allowable hourly x 8760)

SYNTHETIC MINOR or FESOP

- Restricted hourly (including enforceable synthetic minor operational limits)
- Restricted annual (including enforceable synthetic minor operational limits)

TITLE V
100 tpy criteria pollutant
10 tpy single HAP
25 tpy total HAP

NONATTAINMENT
Coshocton: SO₂
Gallia: SO₂

PSD/OFFSETS APPLICABILITY
Existing facility >250 tpy allowable, or
>100 tpy if facility one of 28 listed categories
THRESHOLDS - TPY

CO: 100
NOx: 40
SO₂: 40
TSP: 25
PM₁₀: 15
VOC: 40
Pb: 0.6
Hg: 0.1
Be: 0.0004
F: 3.0
Asbestos: 0.007

MODELING THRESHOLDS - TPY

Vinyl Chloride: 1.0
H₂SO₄ Mist: 7.0
H₂S: 10.0
SO₂: 25
Total Reduced S: 10.0
PM₁₀: 10
Pb: 0.6
Hg: 0.1
Be: 0.0004
F: 3.0
Toxics: 1.0
Asbestos: 0.007
Vinyl Chloride: 1.0
H₂SO₄ Mist: 7.0
H₂S: 10.0
Total Reduced S: 10.0

APPLICABLE RULES - For BAT: explain on Form B; cite SIP rule, NSPS, MACT, etc.

YES NO

- Title V - potential (max PTE @ 8760)
- Title V - actual
- FESOP (see OAC 3745-35-07)
- MACT - Listed category: _____
- HAP emissions > threshold
- 112g - Title V for HAP, but no MACT issued
- NESHAP
- NSPS - Listed category: _____
- Affected facility(ies): _____
- Exemptions: _____
- Nonattainment area
- PSD/OFFSETS - potential (unc. max with fed enf control @ 8760)
- PSD/OFFSETS - actual
- Netting to avoid PSD/OFFSETS
- Synthetic Minor to avoid PSD/OFFSETS
- Modeling required
- Air Toxics Policy - pollutant(s): _____

TERMS AND CONDITIONS

NEW SOURCE REVIEW FORM B

PTI Number: 06-06072 Facility ID: 0684010011

FACILITY NAME Shell Elastomers LLC

FACILITY DESCRIPTION K-1 Railcar Loading Facility CITY/TWP Belpre

- All applicable rules listed, including exemptions
- All SIP rules cited (as applicable: 17-07, 17-08, 17-11, 18, 21-07, 21-09, 23, 75)
- Compliance determination and M, R, Rp for all limits, additional T&Cs and ORs
- Short term limit, except tanks, roads, storage piles, material handling
- TPY limit in applicable rules table
- Adequate T&Cs to support all applicable rules checked above
- PTO template #: _____ Why not/Changes: _____

ENGINEERING REVIEW FORM

FUGITIVE DUST EMISSION SOURCES

1. **Facility name:** Shell Elastomers LLC, Kraton Polymers Belpre Plant
2. **Facility location (city or township):** Belpre
Is location in appendix A area: (yes/no) Yes
3. **Permit application number:** 06-06072
4. **Year source installed:** Unknown
5. **Is source NSPS: (yes/no) No** *If yes category:*
6. **Emission Rates: One source per form**
Total facility Particulate emissions:

<i>Fugitive Dust Source Description</i>	<i>Applicable Section from Paragraph (B) of OAC Rule 3745-17-08 (i.e., (B)(1), (B)(2) . . .)</i>	<i>Uncontrolled lb/hr except for roadways, storage piles, and material handling</i>	<i>Uncontrolled TPY</i>	<i>Control led TPY</i>	<i>Allowable lb/hr or*</i>	<i>Allowable TPY</i>
K-1 Railcar Loading Facility		3.13 lb/hr	13.7	7.0	No Visible Emissions	7.0

* Some sample entries are as follows: 0.030 gr/dscf, no VE's, minimize or eliminate VE's, etc.

7. **Modeling required if PM₁₀ greater than 10 TPY, Also if more than one ton HAP. PSD if major and more than 15 TPY**
8. **Calculations:**
Source of emission factors (AP-42, RACM, or where):

NEW SOURCE REVIEW FORM B

PTI Number: 06-06072 Facility ID: 0684010011

FACILITY NAME Shell Elastomers LLC

FACILITY DESCRIPTION	CITY/TWP
K-1 Railcar Loading Facility	Belpre

Based upon baghouse dust collected by the permittee the uncontrolled emissions were determined to be 3.13 lb/hr.

Therefore, with a 50% control efficiency the actual controlled emissions would be 1.6 lb/hr.

The uncontrolled annual emissions would be $3.13 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 13.7 \text{ TPY}$.

The controlled annual emissions would be $1.6 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 7.0 \text{ TPY}$

The actual hourly emissions would be the same as the controlled hourly emissions, however the actual annual emissions would be

$1.6 \text{ lb/hr} * 3000 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 2.4 \text{ TPY}$

9. *Name of person completing form and date:* Rex S. Haggy, February 16, 2000