State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: DRAFT PERMIT TO INSTALL
ALLEN COUNTY
Application No: 03-3347

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
X	NSPS
X	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: December 8, 1999

BP Chemicals, Inc.
James W Walpole
1900 Fort Amanda Road
Lima, OH 45804

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$ 100** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

cc: **USEPA**
DAPC, NWDO
Noreen Warnock
Indiana Office of Air Management
Alex J Sagady & Associates
Bruce French
Lima-Allen Regional Planning Commission

DRAFT PERMIT TO INSTALL 03-3347

Application Number:	03-3347
APS Premise Number:	0302020015
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	BP Chemicals, Inc.
Person to Contact:	James W Walpole
Address:	1900 Fort Amanda Road
	Lima, OH 45804

Location of proposed air contaminant source(s) [emissions unit(s)]:
Fort Amanda and Adgate Roads
Lima, **Ohio**

Description of proposed emissions unit(s):
14,890 GALLON NITRILES STORAGE TANK WITH INTERNAL FLOATING ROOF.

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 applicable, the permittee shall 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"); and, pursuant to 40 CFR 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 CFR Part 68 by the date specified in 40 CFR 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 CFR Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management 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

Pollutant	Tons Per Year
VOC	0.19
Hydrogen Cyanide	0.0002

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 - SPECIAL 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
14,890 gallon nitriles storage tank (T-9)	40 CFR 60 Subpart VV	See A.I.2a. below
	40 CFR 60 Subpart Kb	See A.III.2. below
	40 CFR 63 Subpart G & H	Internal Floating Roof (See A.I.2b. below)
		Leak Detection & Repair Requirements (See A.I.2c. below)
	OAC rule 3745-21-09(DD)	Leak Detection & Repair Requirements (See A.I.2c. below)

2. Additional Terms and Conditions

2.a 40 CFR 60 Subpart VV regulations overlap with those of 40 CFR 63 Subpart H. 40 CFR 63.160(b) addresses this overlap and states that equipment subject to 40 CFR 60 Subpart VV is required to comply only with the provisions of 40 CFR 63 Subpart H.

2.b Emissions unit T114 shall be equipped and operated with an internal floating roof in accordance with the requirements contained in 40 CFR 63 Subpart G (National Emission Standards for Organic Hazardous Air Pollutants From Synthetic Organic Chemical Manufacturing Industry Process Vents, Storage Vessels, Transfer Operations, and Wastewater).

i. The internal floating roof shall be floating on the liquid surface at all times except when the floating roof must be supported by the leg supports during the following periods [40 CFR 63.119(b)(1)]:

aa. During the initial fill.

ab. After the tank has been completely emptied and degassed.

ac. When the tank is completely emptied before being subsequently refilled.

ii. When the floating roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as soon as possible [40 CFR 63.119(b)(2)]

iii. The internal floating roof shall be equipped with a flexible wiper seal (secondary seal) mounted above a vapor-mounted, resilient foam-filled seal (primary seal). The two seals shall each form a continuous closure that completely covers the space between the wall of the storage tank and the edge of the internal floating roof . [40 CFR 63.119(b)(3)]

iv. Automatic bleeder vents 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. [40 CFR 63.119(b)(4)]

v. The internal floating roof shall meet the following specifications [40 CFR 63.119(b)(5)]:

aa. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and rim space vents is to provide a projection below the liquid surface.

ab. 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 shall be equipped with a cover or lid. The cover or lid shall be equipped with a gasket.

ac. Each penetration of the internal floating roof for the purposes of sampling shall be a sample well. Each sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

ad. Each automatic bleeder vent shall be gasketed.

ae. Each rim space vent shall be gasketed.

af. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

ag. 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.

vi. Each cover or lid on any opening in the internal floating roof shall be closed (i.e, no visible gaps), except when the cover or lid must be open for access. Covers on each access hatch and each gauge float well shall be bolted or fastened so as to be air-tight when they are closed. Rim space vents are to be set to open only when the internal floating roof is not floating or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting.

2.c The permittee shall include the nitriles storage tank (T114) and associated components in the current site fugitive leak detection and repair (LDAR) program. The LDAR program shall be in accordance with the provisions of Ohio Administrative Code (OAC) Rule 3745-21-09(DD), leaks from process units that produce organic chemicals, 40 CFR 60 Subpart VV (Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry), and 40 CFR 63 Subpart H (National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks).

2.d Pursuant to 40 CFR 63.6(e)(3), the owner or operator of an affected source shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard. As required under 40 CFR 63.8(c)(1)(i), the plan shall identify all routine or otherwise predictable continuous monitoring system malfunctions. This plan shall be developed by the owner or operator by the source's compliance date for that relevant standard. The plan shall be incorporated by reference into the source's Title V permit.

The owner or operator shall keep the written startup, shutdown, and malfunction plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the affected source is no longer subject to the provisions of this part. In addition, if the startup, shutdown, and malfunction plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the startup, shutdown, and malfunction plan on record, to be made available for inspection, upon request, by the Administrator, for a period of 5 years after each revision to the plan.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform either of the following storage tank inspection options in accordance with 40 CFR 63.120:

   a. The permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes, and sleeve seals (if any) each time the storage tank is emptied and degassed and at least once every 5 years.

   b. The permittee shall visually inspect the internal floating roof and the secondary seal through

manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. The permittee shall also visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes, and sleeve seals (if any) each time the storage tank is emptied and degassed and at least once every 10 years.

2. In accordance with 40 CFR 63.123(a), the permittee shall keep readily accessible records showing storage tank dimensions and an analysis showing the storage tank capacity.

   40 CFR 63 Subpart G regulations overlap with those of 40 CFR 60 Subpart Kb (Standards of Performance for VOC Storage Vessels). 40 CFR 63.110(b) addresses this overlap and states that a storage tank that is subject to 40 CFR 60 Subpart Kb is required to comply only with the provisions of 40 CFR 63 Subpart G.

3. In accordance with 40 CFR 63.123(b), the permittee shall keep a record of all report submissions required by 40 CFR 63.122:

   a. Initial Notification
   b. Implementation Plan
   c. Notification of Compliance Status
   d. Periodic Reports

4. In accordance with 40 CFR 63.123(g), if the permittee utilizes a time extension to rectify storage tank failures, the documentation required by 40 CFR 63.120(a)(4) shall be kept in a readily accessible location. Documentation of the time extension shall include a description of the failure, substantiation that alternate storage capacity is unavailable, and a schedule of actions that will ensure that the failure is rectified or the tank is emptied.

5. The permittee shall maintain annual records of crude acetonitrile, crude acrylonitrile, formaldehyde and methanol throughput for this emissions unit.

IV. Reporting Requirements

1. In accordance with 40 CFR 63.122(a)(1), 40 CFR 63.182(a)(1) and 40 CFR 63.152(a)(1), the permittee shall submit an Initial Notification as soon as practicable before construction is planned to commence. The Initial Notification shall contain the information required by 40 CFR 63.151(b)(1).

2. In accordance with 40 CFR 63.122(a)(2) and 40 CFR 63.152(a)(2), the permittee shall submit an operating permit application or an Implementation Plan as soon as practicable before construction is planned to commence. The operating permit application or the Implementation Plan shall contain the information required by 40 CFR 63.151(e).

3. In accordance with 40 CFR 63.122(a)(3), 40 CFR 63.182(a)(2) and 40 CFR 63.152(a)(3), the permittee shall submit a Notification of Compliance Status within 150 calendar days after initial start-up. The Notification of Compliance Status shall contain the information required by 40 CFR 63.152(b).

4. In accordance with 40 CFR 63.122(a)(4) and 40 CFR 63.152(a)(4), the permittee shall submit Periodic Reports on the results of each inspection required by 40 CFR 63.120 where a failure of the storage tank control equipment was detected. These Periodic Reports shall be submitted semiannually by March 1 and August 29 of each year and shall include information for the preceding calendar semiannual periods from January 1 to June 30 and July 1 to December 31.

5. In accordance with 40 CFR 63.122(a)(5). The permittee shall submit written notification 30 calendar days in advance of performing a inspection where the tank has been emptied and degassed. If the emptying and degassing of the storage tank could not have been known about 30 days in advance, notification shall be made at least 7 calendar days prior to performing the inspection. The 7 day notification may be made by telephone and immediately followed by written documentation demonstrating why the tank inspection was unplanned.

6. Pursuant to OAC Rule 3745-21-09(DD)(2)(m) and 40 CFR 63.182(a)(3), the permittee shall submit semiannual LDAR reports to the Ohio EPA, Northwest District Office. A single report submitted semiannually will be accepted to satisfy the reporting requirements of both OAC Rule 3745-21-09(DD) and 40 CFR 63.182. The reports shall be submitted by January 24 and July 24 of each year and shall include information for the preceding semiannual period. These reports shall also include the results of the compliance tests required under OAC Rule 3745-21-09(DD)(4)(c).

7. 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.

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

   a. Construction date (no later than 30 days after such date).
   b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date).
   c. Actual start-up date (within 15 days after such date).
   d. Date of performance testing (If required, at least 30 days prior to testing).

V. Testing Requirements

1. Compliance Methods Requirements

   Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method:

a. Control Requirements

Storage Vessel Emission Control (Internal Floating Roof)

Applicable Compliance Method

Compliance with the requirement to install and operate an internal floating roof shall be demonstrated by the recordkeeping specified in Section III.1.

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
14,890 gallon nitriles storage tank (T-9)	OAC rule 3745-31-05	0.19 ton VOC/yr 0.0002 ton hydrogen cyanide/yr

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

1. The maximum annual throughput for this emissions unit shall not exceed the following amounts:

   Crude acetonitrile - 3,100,000 gallons
   Crude acrylonitrile - 3,200,000 gallons
   Formaldehyde - 12,800,000 gallons
   Methanol - 13,200,000 gallons

   The combined annual maximum throughput of all materials for this emissions unit shall not exceed 13,200,000 gallons.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following:

   a. Identification of each material stored;
   b. The amount (gallons per month and total gallons, to date for the calendar year) of material throughput for each individual material stored;
   c. The total amount (gallons per month and total gallons, to date for the calendar year) of material throughput for all materials stored (summation of b).

IV. Reporting Requirements

1. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the annual material throughput limitations as well as the corrective actions taken to achieve compliance. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance Methods Requirements:

   Compliance with the emission limitations in Section B.I.1. of these terms and conditions shall be determined in accordance with the following method:

   a. Emission Limitation:

      0.19 ton VOC/yr

      Applicable Compliance Method:

      The emission limitation was established in accordance with EPA, AP-42 Tanks 4.0 computer program using a maximum annual throughput of 13,200,000 gallons of methanol. Compliance shall be determined in accordance with the monitoring and recordkeeping specified in section B.III.1.

   b. Emission Limitation:

      0.0002 ton hydrogen cyanide/yr

      Applicable Compliance Method:

      The emission limitation was established in accordance with EPA, AP-42 Tanks 4.0 computer program using a maximum annual throughput of 3,200,000 gallons of crude acrylonitrile. Compliance shall be determined in accordance with the monitoring and recordkeeping specified in section B.III.1.

VI. Miscellaneous Requirements

None.