



State of Ohio Environmental Protection Agency

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RE: FINAL PERMIT TO INSTALL MODIFICATION

CERTIFIED MAIL

ALLEN COUNTY

Application No: 03-13628

Fac ID: 0302020015

DATE: 8/25/2005

O + D USA, LLC
Charles Treloar
1900 Fort Amanda Rd
Lima, OH 45802-0628

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-13628

Application Number: 03-13628
Facility ID: 0302020015
Permit Fee: **\$475**
Name of Facility: O + D USA, LLC
Person to Contact: Charles Treloar
Address: 1900 Fort Amanda Rd
Lima, OH 45802-0628

Location of proposed air contaminant source(s) [emissions unit(s)]:
1900 Fort Amanda Rd
Lima, Ohio

Description of proposed emissions unit(s):
Remove references and recordkeeping requirements and change prohibition language and replace with exemption language.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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 (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 B.8 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency 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.
 - iv. If this permit is for an emissions unit located at a Title V facility, then 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.

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 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.

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

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 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. 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 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

1. Compliance Requirements

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.

2. 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 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing 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 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.

5. Construction of New Sources(s)

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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. 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., postmarked), 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>
OC	5.26

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T096 - 35,000 gallon fixed roof butanediol off-spect storage tank (Tank No. 62)	OAC rule 3745-31-05(A)(3)	0.04 tons/yr organic compounds (OC)
		Control Requirements (See A.I.2.a)
	OAC rule 3745-21-07(D)	See A.II.1
	OAC rule 3745-21-09(DD)	Leak Detection and Repair Requirements(See A.I.2.b)
	40 CFR, Part 60, Subpart VV	A.I.2.b

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a submerged fill pipe.
- 2.b The permittee shall include appropriate components for this emission unit in the current site fugitive leak detection and repair program (LDAR). The LDAR program shall comply with the appropriate provisions of OAC rule 3745-21-09 (DD) and 40 CFR 60 Subpart VV. The requirements of the applicable standards in OAC rule 3745-21-09 (DD) are equivalent to or less stringent than the alternative leak detection and repair monitoring plan submitted by the permittee, pursuant to 40 CFR 60 Subpart H. 40 CFR 60 Subpart VV regulations overlap with those of 40 CFR 63 Subpart H. 40 CFR 63.160(b) and (c) address this overlap and state that equipment subject to 40 CFR 60 Subpart VV is required to comply only with the provisions of 40 CFR 63 Subpart H.

II. Operational Restrictions

1. The permittee does not currently employ and has never before employed any photochemically reactive material in this emission unit, as defined in OAC rule 3745-21-01

(C). Therefore, this emission unit is exempt from OAC rule 3745-21-07 (D). A process change that would result in using photochemically reactive materials would constitute a modification as defined in OAC rule 3745-31-01 and would require the permittee to obtain a PTI modification.

2. The permittee shall not exceed an annual material throughput rate of 15,000,000 gallons.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material stored in this emissions unit; and
 - b. documentation on whether or not each liquid organic material stored is a photochemically reactive material.
2. The permittee shall maintain monthly records of the amount of (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any month during which a photochemically reactive material was stored. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 0.04 tons/yr OC

Applicable Compliance Method: The emission limitation was established in accordance with the company supplied working and breathing loss calculations based on an annual throughput of 15,000,000 gallons. Therefore, provided compliance is shown with the maximum annual throughput restriction, compliance with the annual limitation will be assumed.

VI. Miscellaneous Requirements

1. Emission units T096, T097, T099, T100, T101, and T102 were originally permitted under PTI 03-11250, issued on November 10, 1998. Subsequently, the above-mentioned emission units were modified in PTI 03-13628 issued on August 14, 2003, (PTI 03-13628 was administratively modified on September 23, 2004). The provisions of this permit to

O + D USA, LLC

PTI Application: 03-13628

Modification Issued: 8/25/2005

Facility ID: 030202001

Emissions Unit ID: T096

install supersede the provisions of all previous issuances of PTI 03-11250 and PTI 03-13628, for emission units T096, T097, T099, T100, T101, and T102. The provisions of this permit to install will also supersede any future administrative modifications of PTI 03-11250.

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>
T096 - 35,000 gallon fixed roof butanediol off-spect storage tank (Tank No. 62)	None	None

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

None

VI. Miscellaneous Requirements

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T097 - 12,000 gallon fixed roof butanediol organic waste storage tank with internal floating roof (Tank No. 63)	OAC rule 3745-31-05(A)(3)	0.26 tons/yr organic compounds (OC)
		Control Requirements (See A.I.2.a and A.I.2.b)
	OAC rule 3745-21-07(D)	See A.II.1
	OAC rule 3745-21-09(DD)	Leak Detection and Repair Requirements (See A.I.2.c)
	40 CFR Part 60, Subpart VV	Leak Detection and Repair Requirements (See A.I.2.c)

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a submerged fill pipe and an internal floating roof.
- 2.b The permittee shall properly install and operate control equipment for emission units T097 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.

2.c The permittee shall include appropriate components for this emission unit in the current site fugitive leak detection and repair program (LDAR). The LDAR program shall comply with the appropriate provisions of OAC rule 3745-21-09 (DD) and 40 CFR 60 Subpart VV. The requirements of the applicable standards in OAC rule 3745-21-09 (DD) are equivalent to or less stringent than the alternative leak detection and repair monitoring plan submitted by the permittee, pursuant to 40 CFR 60 Subpart H. 40 CFR 60 Subpart VV regulations overlap with those of 40 CFR 63 Subpart H. 40 CFR 63.160(b) and (c) address this overlap and state that equipment subject to 40 CFR 60 Subpart VV is required to comply only with the provisions of 40 CFR 63 Subpart H.

II. Operational Restrictions

1. The permittee does not currently employ and has never before employed any photochemically reactive material in this emission unit, as defined in OAC rule 3745-21-01 (C). Therefore, this emission unit is exempt from OAC rule 3745-21-07 (D). A process change that would result in using photochemically reactive materials would constitute a modification as defined in OAC rule 3745-31-01 and would require the permittee to obtain a PTI modification.
2. The permittee shall not exceed an annual material throughput rate of 4,500,000 gallons.
3. If the inspection required in Section A.III.3.a or A.III.3.c for emissions unit T097 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 owner or operator shall repair the items before filling the storage tank.
4. If the inspection required in Section A.III.3.b for emissions unit T097 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 A.IV.3.b. 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.
5. If the inspection required in Section A.III.3.a or A.III.3.c for emissions unit T097 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).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material stored in this emissions unit; and
 - b. documentation on whether or not each liquid organic material stored is a photochemically reactive material.
2. The permittee shall maintain monthly records of the amount of (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.
3. The permittee is subject to the following inspection requirements for emissions unit T097:
 - 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; and,
 - 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.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify any month during which a photochemically reactive material was stored. Each report shall be submitted within 30 days after the deviation occurs.
- 2. The permittee shall comply with the follow reporting requirements for emission units T097:
 - a. 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 A.III.3.a or Section A.III.3.c. If the inspection required by Section A.III.3.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. Alternatively, this notification including the written

documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA at least 7 days prior to the refilling.

- b. After installing control equipment required by Section A.I.2.b.i, the permittee shall submit a report that describes the control equipment and certifies that the control equipment meets the specifications of Section A.I.2.b.i and Section A.II.3.
- c. If the annual inspection required by Section A.III.3.b reveals any failures as outlined by Section A.III.3. b i, ii, iii, and 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.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 0.26 tons/yr OC

Applicable Compliance Method: The emission limitation was established in accordance with the company supplied working and breathing loss calculations based on an annual throughput of 4,500,000 gallons. Therefore, provided compliance is shown with the maximum annual throughput restriction, compliance with the annual limitation will be assumed.

VI. Miscellaneous Requirements

1. Emission units T096, T097, T099, T100, T101, and T102 were originally permitted under PTI 03-11250, issued on November 10, 1998. Subsequently, the above-mentioned emission units were modified in PTI 03-13628 on issued on August 14, 2003, (PTI 03-13628 was administratively modified on September 23, 2004). The provisions of this permit to install supersede the provisions of all previous issuances of PTI 03-11250 and PTI 03-13628, for emission units T096, T097, T099, T100, T101, and T102. The provisions of this permit to install will also supersede any future administrative modifications of PTI 03-11250.

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>
T097 - 12,000 gallon fixed roof butanediol organic waste storage tank with internal floating roof (Tank No. 63)	None	None

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

None

VI. Miscellaneous Requirements

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T099 - 35,000 gallon fixed roof tetrahydrofuran/water solution storage tank with internal floating roof (Tank No.65)	OAC rule 3745-31-05(A)(3)	2.79 tons/yr organic compounds (OC) Control Requirements (See A.I.2.a and A.I.2.b)
	OAC rule 3745-21-07(D)	See A.II.1
	OAC rule 3745-21-09(DD)	Leak Detection and Repair Requirements (See A.I.2.c)
	40 CFR Part 60, Subpart Kb	Monitoring and Recordkeeping requirements (See A.III.3 and 4)
	40 CFR Part 60, Subpart VV	Leak Detection and Repair Requirements (See A.I.2.c)

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a submerged fill pipe and an internal floating roof.
- 2.b The permittee shall properly install and operate control equipment for emission units T099 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.
- 2.c** The permittee shall include appropriate components for this emission unit in the current site fugitive leak detection and repair program (LDAR). The LDAR program shall comply with the appropriate provisions of OAC rule 3745-21-09 (DD) and 40 CFR 60 Subpart VV. The requirements of the applicable standards in OAC rule 3745-21-09 (DD) are equivalent to or less stringent than the alternative leak detection and repair monitoring plan submitted by the permittee, pursuant to 40

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

II. Operational Restrictions

1. The permittee does not currently employ and has never before employed any photochemically reactive material in this emission unit, as defined in OAC rule 3745-21-01 (C). Therefore, this emission unit is exempt from OAC rule 3745-21-07 (D). A process change that would result in using photochemically reactive materials would constitute a modification as defined in OAC rule 3745-31-01 and would require the permittee to obtain a PTI modification.
2. The permittee shall not exceed an annual material throughput rate of 4,500,000 gallons.
3. If the inspection required in Section A.III.4.a or A.III.4.c for emissions unit T099 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 owner or operator shall repair the items before filling the storage tank.
4. If the inspection required in Section A.III.4.b for emissions unit T099 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 A.IV.3.b. 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.
5. If the inspection required in Section A.III.4.a or A.III.4.c for emissions unit T099 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).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material stored in this emissions unit; and
 - b. documentation on whether or not each liquid organic material stored is a photochemically reactive material.
2. The permittee shall maintain monthly records of the amount of (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.

3. 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.

4. The permittee is subject to the following inspection requirements for emissions unit T099:
 - 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; and,
 - 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 two years in accordance with 40 CFR 60.115b.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any month during which a photochemically reactive material was stored. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall comply with the follow reporting requirements for emission units T099:
 - 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 A.II.4.a or Section A.II.4.c. If the inspection required by Section A.II.4.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. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA at least 7 days prior to the refilling.
 - c. After installing control equipment required by Section A.I.2.b.i, the permittee shall submit a report that describes the control equipment and certifies that the control equipment meets the specifications of Section A.I.2.b.i and Section A.II.3. This report shall be an attachment to the notification required by Section A.IV.3.a.
 - d. If the annual inspection required by Section A.III.4.b reveals any failures as outlined by Section A.III.4.b i, ii, iii, and 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 two years in accordance with 40 CFR 60.115b.

V. Testing Requirements

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

- a. Emission Limitation: 2.79 tons/yr OC

Applicable Compliance Method: The emission limitation was established in accordance with the company supplied working and breathing loss calculations based on an annual throughput of 4,500,000 gallons. Therefore, provided compliance is shown with the maximum annual throughput restriction, compliance with the annual limitation will be assumed.

VI. Miscellaneous Requirements

1. Emission units T096, T097, T099, T100, T101, and T102 were originally permitted under PTI 03-11250, issued on November 10, 1998. Subsequently, the above-mentioned emission units were modified in PTI 03-13628 issued on August 14, 2003, (PTI 03-13628 was administratively modified on September 23, 2004). The provisions of this permit to install supersede the provisions of all previous issuances of PTI 03-11250 and PTI 03-13628, for emission units T096, T097, T099, T100, T101, and T102. The provisions of this permit to install will also supersede any future administrative modifications of PTI 03-11250.

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>
T099 - 35,000 gallon fixed roof tetrahydrofuran/water solution storage tank with internal floating roof (Tank No.65)	None	None

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

None

VI. Miscellaneous Requirements

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T100 - 35,000 gallon fixed roof butanediol maintenance flush storage tank with internal floating roof (Tank No.66)	OAC rule 3745-31-05(A)(3)	1.61 tons/yr organic compounds (OC) Control Requirements (See A.I.2.a and A.I.2.b)
	OAC rule 3745-21-07(D)	See A.II.1
	OAC rule 3745-21-09(DD)	Leak Detection and Repair Requirements (See A.I.2.c)
	40 CFR Part 60, Subpart Kb	Monitoring and Recordkeeping requirements (See A.III.3 and 4)
	40 CFR Part 60, Subpart VV	Leak Detection and Repair Requirements (See A.I.2.c)

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a submerged fill pipe and an internal floating roof.
- 2.b The permittee shall properly install and operate control equipment for emission units T100 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.
- 2.c** The permittee shall include appropriate components for this emission unit in the current site fugitive leak detection and repair program (LDAR). The LDAR program shall comply with the appropriate provisions of OAC rule 3745-21-09 (DD) and 40 CFR 60 Subpart VV. The requirements of the applicable standards in OAC rule 3745-21-09 (DD) are equivalent to or less stringent than the alternative leak detection and repair monitoring plan submitted by the permittee, pursuant to 40 CFR 60 Subpart H. 40 CFR 60 Subpart VV regulations overlap with those of 40 CFR 63 Subpart H. 40 CFR 63.160(b) and (c) address this overlap and state that equipment

subject to 40 CFR 60 Subpart VV is required to comply only with the provisions of 40 CFR 63 Subpart H.

II. Operational Restrictions

1. The permittee does not currently employ and has never before employed any photochemically reactive material in this emission unit, as defined in OAC rule 3745-21-01 (C). Therefore, this emission unit is exempt from OAC rule 3745-21-07 (D). A process change that would result in using photochemically reactive materials would constitute a modification as defined in OAC rule 3745-31-01 and would require the permittee to obtain a PTI modification.
2. The permittee shall not exceed an annual material throughput rate of 5,000,000 gallons.
3. If the inspection required in Section A.III.4.a or A.III.4.c for emissions unit T100 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 owner or operator shall repair the items before filling the storage tank.
4. If the inspection required in Section A.III.4.b for emissions unit T100 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 within 45 days, a 30-day extension may be requested in the inspection report required by Section A.IV.3.b. 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.
5. If the inspection required in Section A.III.4.a or A.III.4.c for emissions unit T100 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).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material stored in this emissions unit; and
 - b. documentation on whether or not each liquid organic material stored is a photochemically reactive material.
2. The permittee shall maintain monthly records of the amount of (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.
3. 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.

4. The permittee is subject to the following inspection requirements for emissions unit T100:
 - 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; and,
 - 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 two years in accordance with 40 CFR 60.115b.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any month during which a photochemically reactive material was stored. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall comply with the follow reporting requirements for emission units T100:
 - 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 A.II.4.a or Section A.II.4.c. If the inspection required by Section A.II.4.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. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Ohio EPA at least 7 days prior to the refilling.
 - c. After installing control equipment required by Section A.I.2.b.i, the permittee shall submit a report that describes the control equipment and certifies that the control equipment meets the specifications of Section A.I.2.b.i and Section A.II.3. This report shall be an attachment to the notification required by Section A.IV.3.a.
 - d. If the annual inspection required by Section A.III.4.b reveals any failures as outlined by Section III.4.b i, ii, iii, and 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 two years in accordance with 40 CFR 60.115b.

V. Testing Requirements

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

- a. Emission Limitation: 1.61 tons/yr OC

Applicable Compliance Method: The emission limitation was established in accordance with the company supplied working and breathing loss calculations based on an annual throughput of 5,000,000 gallons. Therefore, provided compliance is shown with the maximum annual throughput restriction, compliance with the annual limitation will be assumed.

VI. Miscellaneous Requirements

1. Emission units T096, T097, T099, T100, T101, and T102 were originally permitted under PTI 03-11250, issued on November 10, 1998. Subsequently, the above-mentioned emission units were modified in PTI 03-13628 issued on August 14, 2003, (PTI 03-13628 was administratively modified on September 23, 2004). The provisions of this permit to install supersede the provisions of all previous issuances of PTI 03-11250 and PTI 03-13628, for emission units T096, T097, T099, T100, T101, and T102. The provisions of this permit to install will also supersede any future administrative modifications of PTI 03-11250.

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>
T100 - 35,000 gallon fixed roof butane diol maintenance flush storage tank with internal floating roof (Tank No.66)	None	None

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

None

VI. Miscellaneous Requirements

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T101 - 376,000 gallon fixed roof butanediol product storage tank (Tank No.68)	OAC rule 3745-31-05(A)(3)	0.30 tons/yr organic compounds (OC)
		Control Requirements (See A.I.2.a)
	OAC rule 3745-21-07(D)	See A.II.1
	OAC rule 3745-21-09(DD)	Leak Detection and Repair Requirements (See A.I.2.b)
	40 CFR Part 60, Subpart VV	Leak Detection and Repair Requirements (See A.I.2.b)

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a submerged fill pipe.
- 2.b The permittee shall include appropriate components for this emission unit in the current site fugitive leak detection and repair program (LDAR). The LDAR program shall comply with the appropriate provisions of OAC rule 3745-21-09 (DD) and 40 CFR 60 Subpart VV. The requirements of the applicable standards in OAC rule 3745-21-09 (DD) are equivalent to or less stringent than the alternative leak detection and repair monitoring plan submitted by the permittee, pursuant to 40 CFR 60 Subpart H. 40 CFR 60 Subpart VV regulations overlap with those of 40 CFR 63 Subpart H. 40 CFR 63.160(b) and (c) address this overlap and state that equipment subject to 40 CFR 60 Subpart VV is required to comply only with the provisions of 40 CFR 63 Subpart H.

II. Operational Restrictions

1. The permittee does not currently employ and has never before employed any photochemically reactive material in this emission unit, as defined in OAC rule 3745-21-01 (C). Therefore, this emission unit is exempt from OAC rule 3745-21-07 (D). A process change that would result in using photochemically reactive materials would constitute a modification as defined in OAC rule 3745-31-01 and would require the permittee to obtain a PTI modification.
2. The permittee shall not exceed an annual material throughput rate of 15,000,000 gallons.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material stored in this emissions unit; and
 - b. documentation on whether or not each liquid organic material stored is a photochemically reactive material.
2. The permittee shall maintain monthly records of the amount of (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any month during which a photochemically reactive material was stored. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

- a. Emission Limitation: 0.30 tons/yr OC

Applicable Compliance Method: The emission limitation was established in accordance with the company supplied working and breathing loss calculations based on an annual throughput of 15,000,000 gallons. Therefore, provided compliance is shown with the maximum annual throughput restriction, compliance with the annual limitation will be assumed.

VI. Miscellaneous Requirements

1. Emission units T096, T097, T099, T100, T101, and T102 were originally permitted under PTI 03-11250, issued on November 10, 1998. Subsequently, the above-mentioned emission units were modified in PTI 03-13628 issued on August 14, 2003, (PTI 03-13628 was administratively modified on September 23, 2004). The provisions of this permit to install supersede the provisions of all previous issuances of PTI 03-11250 and PTI 03-13628, for emission units T096, T097, T099, T100, T101, and T102. The provisions of this permit to install will also supersede any future administrative modifications of PTI 03-11250.

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>
T101 - 376,000 gallon fixed roof butanediol product storage tank (Tank No.68)	None	None

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

None

VI. Miscellaneous Requirements

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T102 - 376,000 gallon fixed roof butanediol product storage tank (Tank No. 69)	OAC rule 3745-31-05(A)(3)	0.30 tons/yr organic compounds (OC)
	OAC rule 3745-21-07(D)	Control Requirements (See A.I.2.a)
	OAC rule 3745-21-09(DD)	See A.II.1
	40 CFR Part 60, Subpart VV	Leak Detection and Repair Requirements (See A.I.2.b)
		Leak Detection and Repair Requirements (See A.I.2.b)

2. Additional Terms and Conditions

- 2.a The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of a submerged fill pipe.
- 2.b The permittee shall include appropriate components for this emission unit in the current site fugitive leak detection and repair program (LDAR). The LDAR program shall comply with the appropriate provisions of OAC rule 3745-21-09 (DD) and 40 CFR 60 Subpart VV. The requirements of the applicable standards in OAC rule 3745-21-09 (DD) are equivalent to or less stringent than the alternative leak detection and repair monitoring plan submitted by the permittee, pursuant to 40 CFR 60 Subpart H. 40 CFR 60 Subpart VV regulations overlap with those of 40 CFR 63 Subpart H. 40 CFR 63.160(b) and (c) address this overlap and state that equipment subject to 40 CFR 60 Subpart VV is required to comply only with the provisions of 40 CFR 63 Subpart H.

II. Operational Restrictions

1. The permittee does not currently employ and has never before employed any photochemically reactive material in this emission unit, as defined in OAC rule 3745-21-01 (C). Therefore, this emission unit is exempt from OAC rule 3745-21-07 (D). A process change that would result in using photochemically reactive materials would constitute a modification as defined in OAC rule 3745-31-01 and would require the permittee to obtain a PTI modification.
2. The permittee shall not exceed an annual material throughput rate of 15,000,000 gallons.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material stored in this emissions unit; and
 - b. documentation on whether or not each liquid organic material stored is a photochemically reactive material.
2. The permittee shall maintain monthly records of the amount of (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any month during which a photochemically reactive material was stored. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

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

- a. Emission Limitation: 0.30 tons/yr OC

Applicable Compliance Method: The emission limitation was established in accordance with the company supplied working and breathing loss calculations based on an annual throughput of 15,000,000 gallons. Therefore, provided compliance is shown with the maximum annual throughput restriction, compliance with the annual limitation will be assumed.

VI. Miscellaneous Requirements

1. Emission units T096, T097, T099, T100, T101, and T102 were originally permitted under PTI 03-11250, issued on November 10, 1998. Subsequently, the above-mentioned emission units were modified in PTI 03-13628 on August 14, 2003, (PTI 03-13628 was administratively modified on September 23, 2004). The provisions of this permit to install supersede the provisions of all previous issuances of PTI 03-11250 and PTI 03-13628, for emission units T096, T097, T099, T100, T101, and T102. The provisions of this permit to install will also supersede any future administrative modifications of PTI 03-11250.

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>
T102 - 376,000 gallon fixed roof butanediol product storage tank (Tank No. 69)	None	None

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

None

VI. Miscellaneous Requirements

None