



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
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Columbus, OH 43215

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Mailing Address:

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

RE: **FINAL PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL**

ASHLAND COUNTY  
Application No: 03-09708

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

DATE: 5/13/2004

Ashland Specialty Chemicals  
Amy Dechristopher  
1745 Cottage Street  
Ashland, OH 43216

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, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

NWDO



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-09708

Application Number: **03-09708**

APS Premise Number: **0303010043**

Permit Fee: **\$0**

Name of Facility: **Ashland Specialty Chemicals Dechristopher**

Person to Contact: **Amy**

Address: **1745 Cottage Street**

**Ashland, OH 43216**

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

**1745 Cottage St  
Ashland, OHIO**

Description of modification:

**This is an administrative modification to PTI number 03-09708 issued on April 9 1997 to correct OAC rule 3745-21-07G2 applicability.**

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

**GENERAL PERMIT CONDITIONS**

**TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

**CONSTRUCTION OF NEW SOURCES**

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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

**PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

### **PUBLIC DISCLOSURE**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

### **APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

### **BEST AVAILABLE TECHNOLOGY**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

### **SOURCE OPERATION AND OPERATING PERMIT REQUIREMENTS AFTER COMPLETION OF CONSTRUCTION**

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).

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

**AIR EMISSION SUMMARY**

The air contaminant emissions units listed below comprise the Permit to Install for **Ashland Specialty Chemicals** located in **ASHLAND** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P018	5 0 0 g a l l o n adhesive/sealant mixer	Compliance with the terms and conditions of this permit.	3745-31-05 3745-21-07 (G)(2)	30.0 lbs PM/day 3.4 lbs OC/hour and 17.4 lbs OC/day * No visible emissions
P019	5 0 0 g a l l o n adhesive/sealant mixer	Compliance with the terms and conditions of this permit.	3745-31-05 3745-21-07 (G)(2)	30.0 lbs PM/day 2.7 lbs OC/hour and 15.4 lbs OC/day * No visible emissions
P020	2 5 0 g a l l o n adhesive/sealant mixer	Compliance with the terms and conditions of this permit	3745-31-05 3745-21-07 (G)(2)	30.0 lbs PM/day 4.6 lbs OC/hour and 26.3 lbs OC/day * No visible emissions
P021	1 7 0 0 g a l l o n adhesive/sealant mixer	Compliance with the terms and conditions of this permit	3745-31-05 3745-21-07 (G)(2)	40.0 lbs PM/day 5.4 lbs OC/hour and 31.2 lbs OC/day * No visible emissions
P022	Tote and pail filling line for adhesives/sealants	Compliance with the terms and conditions of this permit.	3745-31-05	12.0 lbs OC/hour
P023	Pail filling line for adhesives/sealants	Compliance with the terms and conditions of this permit	3745-31-05	14.0 lbs OC/hour

\* OAC rule 3745-21-07 (G)(2) is an applicable rule, 8 lbs OC/hour and 40 lbs/OC day, however Ashland Chemical Company requests more stringent emissions limits.

**SUMMARY**

Ashland Specialty Chemicals  
PTI Application: 03-09708  
Modification Issued: 5/13/2004

Facility ID: 0303010043

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
OC	25.9
PM	23.7

**RECORD(S) RETENTION AND AVAILABILITY**

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

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Northwest District Office- DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

**MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Northwest District Office - DAPC, 347 North Dunbridge Road, Bowling Green, Ohio 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

**AIR POLLUTION NUISANCES PROHIBITED**

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

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

INTRODUCTION: Ashland Chemical Company submitted permit to install (PTI) applications for four adhesive/sealant mixers, Ohio EPA emissions units P018 through P021, and two container filling lines for adhesives/sealants, OEPA emissions units P022 and P023.

**A. Applicable Emission Limitations and/or Control Requirements**

1. Adhesives and sealants produced by emissions units P018 through P021 are “photochemically reactive” as defined in Ohio Administrative Code (OAC) Rule 3745-21-01 (C) (5). According to applicable rule OAC rule 3745-21-07 (G) (2), organic compound emissions shall not exceed 8 lbs OC/hour and 40 lbs OC/day. Ashland Chemical Company, however, requested more stringent permit allowable mass emission rates for emissions units P018 through P021.
2. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 03-9708. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation (s) specified in this permit was (were) established in accordance with the Ohio EPA’s “Air Toxics Policy” and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit’s exhaust system, as specified in the application. Compliance with the Ohio EPA’s “Air Toxics Policy” was demonstrated for each pollutant based on the screen3 model and a comparison of the predicated 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for the worst-case toxic pollutant:

**Pollutant: Methylene Chloride**

TLV: (ug/m3): 174,000

Maximum Hourly Emission Rate (pounds/hour): 4.61

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 141.5

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4,143

Any of the following changes may be deemed a “modification” to the emissions unit and, as such, prior notification to and approval from the Ohio EPA, Northwest District Office are required, including the possible issuance of modifications to PTI number 03-9708 and the operating permit.

- a. any changes in the composition of the adhesives/sealants, or the use of new raw materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled, “American Conference of Governmental Industrial Hygienists (ACGIH), “ than the lowest TLV value specified in the above table;

- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
  - c. a reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly emission rate, specified in the above table, would result in an exceedance of the new MAGLC; and
  - d. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation (s) established by this permit or would otherwise be considered a “modification” as defined in OAC rule 3745-31-01.
3. Ashland Chemical Company requested an annual facility methylene chloride emissions limit of one ton per year, a hazardous air pollutant (HAP) as defined by section 112 (b) of the Clean Air Act, amended November 15, 1990.

**B. Operational Restrictions**

1. The emissions of organic compounds from emissions unit P018 shall not exceed 3.4 pounds per hour, 17.4 pounds per day, and 2.7 tons per year, based upon a rolling 12-month summation of monthly emissions. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month (s)</u>	<u>Maximum Allowable Cumulative Emissions Of Organic Compounds (Tons)</u>
1	0.235
1-2	0.470
1-3	0.705
1-4	0.940
1-5	1.175
1-6	1.410
1-7	1.645
1-8	1.880
1-9	2.115
1-10	2.300
1-11	2.500
1-12	2.700

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for organic compounds shall be based upon a rolling, 12-month summation of the monthly emissions.

2. The emissions of organic compounds from emissions unit P019 shall not exceed 2.7 pounds per

hour, 15.4 pounds per day, and 2.6 tons per year, based upon a rolling 12-month summation of monthly emissions. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month (s)</u>	<u>Maximum Allowable Cumulative Emissions Of Organic Compounds (Tons)</u>
1	0.217
1-2	0.434
1-3	0.651
1-4	0.868
1-5	1.085
1-6	1.302
1-7	1.519
1-8	1.736
1-9	1.953
1-10	2.170
1-11	2.387
1-12	2.600

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for organic compounds shall be based upon a rolling, 12-month summation of the monthly emissions.

- The emissions of organic compounds from emissions unit P020 shall not exceed 4.6 pounds per hour, 26.3 pounds per day, and 4.5 tons per year, based upon a rolling 12-month summation of monthly emissions. To ensure Enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month (s)</u>	<u>Maximum Allowable Cumulative Emissions Of Organic Compounds (Tons)</u>
1	0.375
1-2	0.750
1-3	1.125
1-4	1.500
1-5	1.875
1-6	2.250
1-7	2.625
1-8	3.000
1-9	3.375
1-10	3.750

1-11	4.125
1-12	4.500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for organic compounds shall be based upon a rolling, 12-month summation of the monthly emissions.

- The emissions of organic compounds from emissions unit P021 shall not exceed 5.4 pounds per hour, 31.2 pounds per day, and 5.7 tons per year, based upon a rolling 12-month summation of monthly emissions. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month (s)</u>	<u>Maximum Allowable Cumulative Emissions Of Organic Compounds (Tons)</u>
1	0.475
1-2	0.950
1-3	1.425
1-4	1.900
1-5	2.375
1-6	2.850
1-7	3.325
1-8	3.800
1-9	4.275
1-10	4.750
1-11	5.225
1-12	5.700

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for organic compounds shall be based upon a rolling, 12-month summation of the monthly emissions.

- The emissions of organic compounds from emission unit P022 shall not exceed 3.9 tons per year, based upon a rolling 12-month summation of monthly emissions. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month (s)</u>	<u>Maximum Allowable Cumulative Emissions Of Organic Compounds (Tons)</u>
1	0.325
1-2	0.650
1-3	0.975

1-4	1.300
1-5	1.625
1-6	1.950
1-7	2.275
1-8	2.600
1-9	2.925
1-10	3.250
1-11	3.575
1-12	3.900

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for organic compounds shall be based upon a rolling, 12-month summation of the monthly emissions.

6. The emissions of organic compounds from emission unit P023 shall not exceed 6.5 tons per year, based upon a rolling 12-month summation of monthly emissions. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month (s)</u>	<u>Maximum Allowable Cumulative Emissions Of Organic Compounds (Tons)</u>
1	0.542
1-2	1.084
1-3	1.626
1-4	2.168
1-5	2.710
1-6	3.252
1-7	3.794
1-8	4.336
1-9	4.878
1-10	5.420
1-11	5.962
1-12	6.500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for organic compounds shall be based upon a rolling, 12-month summation of the monthly emissions.

7. The permittee shall fill only totes or only pails at any one time in Ohio EPA emissions unit P022.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for emission units P018, P019, P020, and P021 to demonstrate compliance with permit allowable organic compound emission

limitations:

- a. the company identification of adhesives/sealants produced for each emissions unit;
  - b. the number of batches per day for each emissions unit;
  - c. the organic compound emissions (from adhesives/sealants and/or cleanup materials) for each emissions unit, in pounds per batch;
  - d. the total organic compound emissions (from adhesives/sealants and/or cleanup materials) for each emissions unit, i.e. (B) x (c) in pounds per day;
  - e. the total number of hours per day each emissions unit was in operation; and
  - f. the average hourly organic compound emission rate (from adhesives/sealants and/or cleanup materials) for each emissions unit, i.e. (D)/(e), in pounds per hour.
2. The permittee shall collect and record the following information for emissions units P018, P019, P020, P021, P022 and P023:
    - a. during the first twelve months of operation following issuance of this permit, the permittee shall record for each emissions unit the cumulative organic compound emissions for each calendar month; and
    - b. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation of the monthly organic compound emissions for each emissions unit.
  3. For emissions unit P022, Tote and Pail Filling Line, the permittee shall collect and record the total number of hours totes and/or pails were filled each day.
  4. The permittee shall collect and record the annual facility methylene chloride emission rate, in tons per year.
  5. These records shall be maintained in the company's files at the facility for a period of at least five years and shall be available for inspection, upon request, by personnel for the Ohio EPA.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions units P018, P019, P020, P021, P022, and P023 which include the following information:
  - a. an identification of each day during which the average hourly organic compound emission rate exceed the hourly emission limit of this permit, and the actual average hourly organic compound emission rate for each such day;

- b. an identification of each day during which the organic compound emission rate exceeded the daily emission limit of this permit, and the actual organic compound emission rate for each such day; and
  - c. an identification of all exceedances of the rolling, 12-month emission limitation for organic compounds and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.
2. The permittee shall submit deviation (excursion) reports for annual facility methylene chloride emission rates exceeding one ton per year, and the actual annual facility methylene chloride emission rate for each such year.
3. The permittee shall submit annual reports to the Ohio EPA, Northwest District Office which identify the total organic compound emission rate, for emission units P018, P019, P020, P021, P022, and P023, during the reporting period. The semi-annual reports shall be submitted by January 15 of each year and shall cover the previous twelve calendar months (January through December).
4. All reports, notifications, etc., required by the above terms and conditions are to be submitted to the Ohio Environmental Protection Agency, Northwest District Office, Division of Air Pollution Control, 347 North Dunbridge Road, Bowling Green, Ohio 43402.

**E. Testing Requirements**

Any determination of OC content (OC content means all the organic compounds that are in an adhesive/sealant expressed in pounds of OC per gallon), solids content, or density or adhesive/sealant shall be based on the raw materials as employed. The company shall determine the composition of the adhesives/sealants by formulation data supplied by the manufacturer of the raw materials, or from data determined by an analysis of each adhesive/sealant, as received by Reference Method 24.

The Ohio EPA may require the company, if is used formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of adhesives/sealants by Reference Method 24 or an equivalent or alternative method.

**F. Miscellaneous Requirements**

None